



TITLE VI



2014-2017 IMPLEMENTATION PLAN

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

PREPARED BY THE OFFICE OF FAIR PRACTICES



2014-2017 Title VI Implementation Plan Title VI of the Civil Rights Act of 1964

Prepared by:
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January 2014



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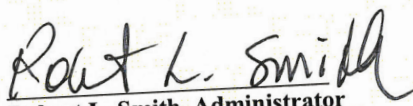
MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
James T. Smith, Jr., Secretary • Robert L. Smith, Administrator

APPROVAL SIGNATURE PAGE

I hereby acknowledge the receipt of the Maryland Transit Administration's (MTA) Title VI Implementation Plan 2014-2017. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration recipients.


Robert L. Smith, Administrator
Maryland Transit Administration

Date

1/16/14

I. Title VI Plan Purpose and Application

The Maryland Department of Transportation – Maryland Transit Administration’s (MTA) Title VI Plan is prepared in compliance with 49 CFR Section 21.9(b) and also the requirements and guidelines of Title VI Circular 4702.1B. Technical aid was provided by the Federal Transit Administration-Region III Office, Philadelphia, PA.

This plan provides specific information that explains MTA Title VI activities pertaining to organization and staffing, monitoring and review processes, complaint procedures, Title VI Policy, annual work plan and applicable attachments (brochures, procedures).

The provisions of the Title VI Plan apply to all recipients of Federal assistance with and throughout MTA. A recipient means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes sub recipients, direct recipients, designated recipients, and primary recipients. The program applies to all phases of MTA operations.

II. Glossary of Terms

Adverse Effect – The totality of significant individual or cumulative human health or environmental effects including interrelated social and economic effects which may include, but are not limited to exclusion or separation of individuals within a given community and the denial of or significant delay in the receipt of benefits of DOT programs, policies, or activities.

Beneficiary – Any person or group of persons (other than States) entitled to receive benefits directly or indirectly, from any federally assisted program, i.e., relocates, impacted citizens, communities, etc.

Census Data – Information used by transportation planners to make projections about future travel patterns, housing needs and the like. Required by the U.S. Constitution, the U.S. Census is a complete listing of the population conducted every 10 years by the U.S. Census Bureau (the last one was completed in 2010).

Compliance – A satisfactory condition existing when a recipient has effectively implemented all of the Title VI requirements or can demonstrate that every good faith effort toward achieving this end has been made.

Demand response system - Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.

Designated recipient - means an entity designated, in accordance with the planning process under sections 5303 and 5304, by the Governor of a State, responsible local officials, and publicly owned operators of public transportation, to receive and apportion amounts under section 5336 to urbanized areas of 200,000 or more in population; or a State or regional authority, if the authority is responsible under the laws of a State for a capital project and for financing and directly providing public transportation.

Direct recipient - means an entity that receives funding directly from FTA. For purposes of this Circular, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to sub recipients, whereas a primary recipient does.

Discrimination - refers to any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate impact - refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disproportionate burden - refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Disparate treatment - refers to actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Fixed route - refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Federal financial assistance refers to

- (1) grants and loans of Federal funds;
- (2) the grant or donation of Federal property and interests in property;
- (3) the detail of Federal personnel;
- (4) the sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and
- (5) any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

Limited English Proficient (LEP) persons - refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Low-income person - means a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-income population - refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority persons include the following:

- **American Indian and Alaska Native**, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian**, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- **Black or African American**, which refers to people having origins in any of the Black racial groups of Africa.
- **Hispanic or Latino**, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **Native Hawaiian or Other Pacific Islander**, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority population - means any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Minority transit route - means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.

National origin - means the particular nation in which a person was born, or where the person's parents or ancestors were born.

Primary recipient - means any FTA recipient that extends Federal financial assistance to a sub recipient.

Provider of fixed route public transportation (or "transit provider") - means any entity that operates public transportation service, and includes States, local and regional entities, and public and private entities.

Public transportation - means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation can be either fixed route or demand response service. (does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services)

Recipient - means any public or private entity that receives Federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes sub recipients, direct recipients, designated recipients, and primary recipients.

Service area - refers either to the geographic area in which a transit agency is authorized by its charter to provide service to the public, or to the planning area of a State Department of Transportation or Metropolitan Planning Organization.

Service standard/policy - means an established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Sub recipient - means an entity that receives Federal financial assistance from FTA through a primary recipient.

Title VI Program - refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

III. MTA Title VI Policy Statement



MARYLAND TRANSIT ADMINISTRATION MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
James T. Smith, Jr., Secretary • Robert L. Smith, Administrator

TITLE VI POLICY STATEMENT

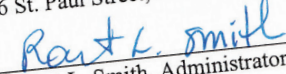
It is the policy of the Maryland Transit Administration (MTA), in accordance with Title VI of the Civil Rights Act of 1964, as amended, and the Assurance set forth in the Department's Title VI Compliance and Implementation Plan to assure that "no person in [Maryland] shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discriminate under any program or activity" for which the MTA receives Federal financial assistance (42 U.S.C. Section 2000d). Furthermore, it shall be the policy of the MTA to ensure that as a recipient of Federal-aid funding, it will ensure nondiscrimination in all of its programs and activities whether federally funded or not. The MTA is steadfast in its commitment to ensure the uniform adoption of this policy.

Accordingly, to ensure compliance with Title VI of the Civil Rights Act and other pertinent directives, the Maryland Transit Administration commits to:

1. Conducting and operating each of its programs and facilities in compliance with all requirements imposed by, or pursuant to, Title VI of the Civil Rights Act and other pertinent directives;
2. Providing nondiscriminatory methods of administration for programs and to give reasonable guarantee that the Maryland Transit Administration, other recipients, subgrantees, contractors, subcontractors, and other participants of Federal financial assistance under such programs will comply with all requirements imposed by Title VI of the Civil Rights Act and other pertinent directives; and
3. Promptly taking any measures necessary to effect compliance with Title VI of the Civil Rights Act and other pertinent directives.

The MTA will include Title VI language in all written contracts and will monitor for compliance when distributing federal aid funds to other transit entities. The MTA's Title VI Coordinator in the Office of Fair Practices is responsible for initiating and monitoring Title VI activities, preparing required reports, and other MTA responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Individuals with questions or requiring additional information relating to this policy or the implementation of the Maryland Transit Administration's Title VI Program should contact the Office of Fair Practices located on the Twentieth Floor, William Donald Schaefer Building, 6 St. Paul Street, Baltimore, MD, 21202 Telephone (410) 767-3944.


Robert L. Smith, Administrator

Date 9/14/13

6 St. Paul Street • Baltimore, Maryland 21202-1614 • TTY 410-539-3497 • Toll Free 1-866-743-3682

IV. Authority

The Federal Transit Administration (FTA) Office of Civil Rights is authorized by the Secretary of Transportation to conduct civil rights compliance reviews. The Maryland Transit Administration (MTA) is a recipient of FTA funding assistance and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following Federal Register Notices, Circulars, Regulations, Executive Orders, and Departmental Orders discussing Title VI:

- Title VI Circular 4702.1B, October 1, 2012, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"
- Federal Register Notice on Circular 4702.1B (77 FR 52116) August 28, 2012
- Memo: Implementing Title VI Requirements in Metropolitan and Statewide Planning
- Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.
- Federal Transit Laws, Title 49, United States Code, Chapter 53.
- 49 CFR § 1.51.
- 49 CFR part 21.
- 28 CFR § 42.401 et seq.
- Executive Order 13166 of August 11, 2000: Limited English Proficiency
- DOT Guidance of 2001: To Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries

V. General Introduction

"Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI. Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activity are Federally funded." FTA 4702.1B

Overview

The Maryland Transit Administration (MTA) is a division of the Maryland Department of Transportation, and one of the largest multi-modal transit systems in the United States. MTA operates Local and Commuter Buses, Light Rail, Metro Subway, Maryland Area Regional Commuter (MARC) Train Service, and a comprehensive Paratransit (Mobility) system. MTA also manages the Taxi Access system, and directs funding and statewide assistance to Locally Operated Transit Systems (LOTS) in each of Maryland's 23 counties, Baltimore City, Annapolis and Ocean City.

More than 3,200 dedicated employees including full-time, part-time, contractual, and temporary personnel make up the MTA family.

The MTA also has its own Police Force comprised of Uniform Patrol and Plainclothes Units, Detective Unit, Visible Intermodal Prevention and Response (VIPR) Teams/Tactical Unit, Video Surveillance Teams, Bicycle Patrol Squad, Motorcycle Patrol Squad, K-9 Police Officer Unit, Homeland Security Drills, and Weekly Zone Enforced Unified Sweeps proudly serving the citizens of Maryland 24/7.

With its primary operations within the Maryland 695 Beltway, the MTA operating services are comprised of: 51 core Local Bus routes, 18 Commuter bus routes (Baltimore routes: 5 and Washington, DC routes: 13), 15.5 miles of Metro Subway service, 29.5 miles of Light Rail service, MARC Train Service—a commuter rail system that operates three lines of service: Penn Line, Brunswick Line and Camden Line, and Mobility/Para transit service either directly or through contractual arrangements.

Core Bus

The MTA operates approximately 669 buses and 51 core bus routes. Our four Bus Divisions: Bush, Eastern, Kirk, and Northwest work closely together in providing transportation service to millions of passengers. MTA core areas of operation include the Baltimore metropolitan areas of Baltimore City, Baltimore County, and Anne Arundel County.

Commuter Bus

Commuter Bus is 100% contracted transportation serving both Baltimore and Washington, DC bound commuters from outlying counties. Commuter Bus operates primarily to peak travel destinations and during peak travel times on weekdays only. Currently there are 18 routes that operate under ten multi-years contracts.

Baltimore bound trips consume only 15% of Commuter Bus resources while the remaining 85% is concentrated towards Washington, DC. There are three transportation service providers under contract.

Commuter Bus – BALTIMORE

As part of the MTA bus service, the Commuter Bus Program provides express transit service (at a premium price) within the Baltimore metropolitan region. These long-haul routes connect suburban residential areas, Downtown Baltimore, and suburban employment centers. Commuters are able to access these express lines via a number of Park & Ride lots located throughout the region. Five commuter routes operate in the Baltimore region with 1,307 weekday boarding's.

Commuter Bus – WASHINGTON

The MTA provides nineteen privately contracted Commuter Bus routes that provides express transit service from far reaching suburbs that include Hagerstown and Urbana in Western Maryland, Columbia, California, La Plata and Waldorf, Prince Frederick, and North Beach in Southern Maryland into Washington D.C. The number of DC weekday boarding's averages 15,105.

Light Rail

The Light Rail operates at street level, traveling on bridges to cross several bodies of water. There are 33 station stops along the 29.5-mile long system operating between Timonium and Linthicum and Hunt Valley in Baltimore County to Cromwell Station and BWI Marshall Airport in Anne Arundel County with service also to Amtrak Penn Station and Camden Yards.

The Light Rail is a "barrier free" system. Before boarding Light Rail, commuters purchase tickets from the ticket vending machine. Tickets are not available onboard. Light Rail has an average of 27,595 weekday boarding's.

Metro Subway

The Metro Division of the Maryland Transit Administration (MTA) began operating in 1983, has a line length of 15.5 miles, and 14 stations extending from the northern Owings Mills Town Centre in Baltimore County, through the heart of downtown Baltimore's business, shopping and sightseeing district to the world renowned Johns Hopkins Hospital. Metro subway has an average of 48,499 weekday boarding's.

MARC

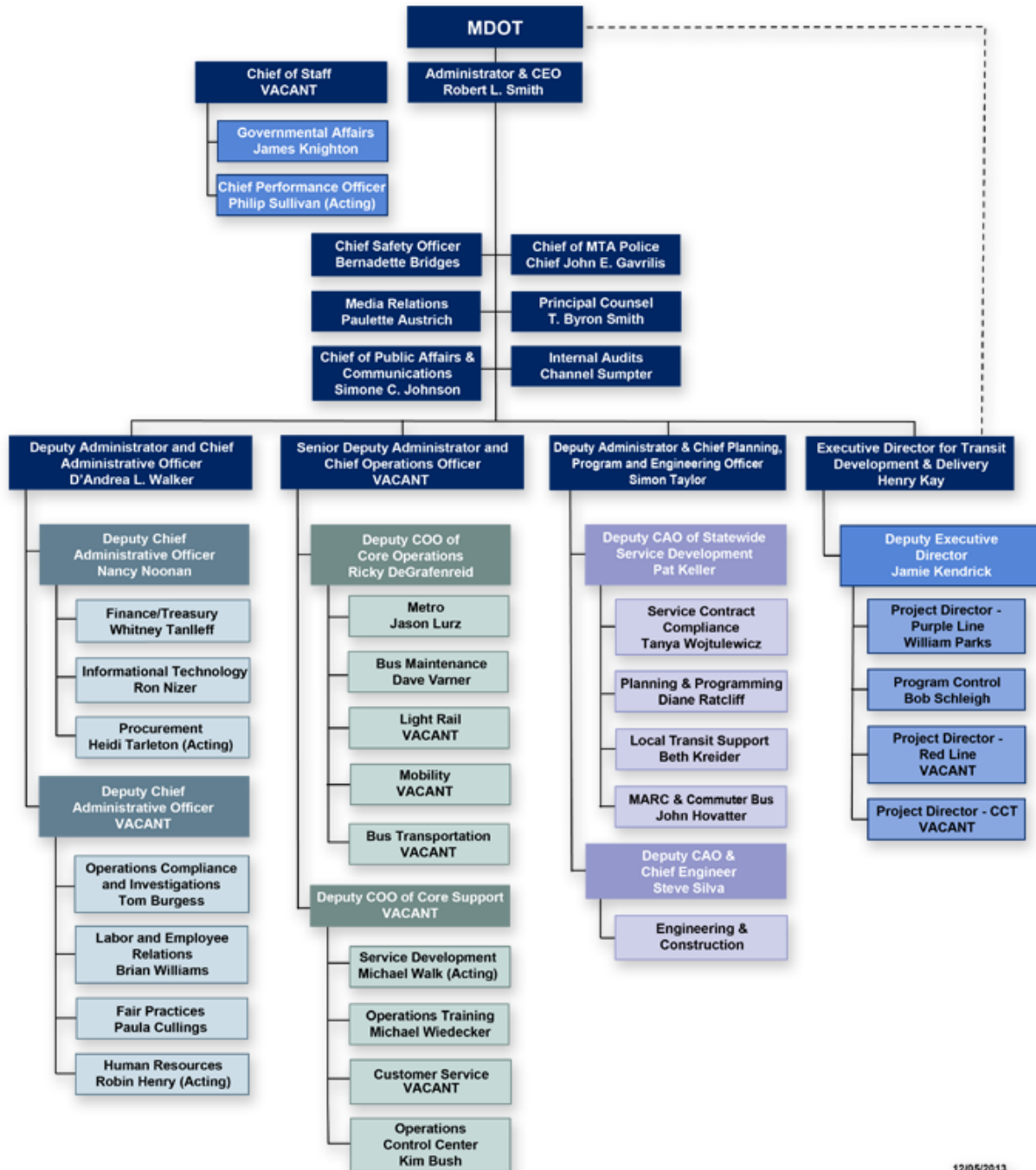
MARC (Maryland Area Regional Commuter) Train Service is a commuter rail system that operates three lines of service: Penn Line, Brunswick Line and Camden Line. There are 42 station stops operating along 202 miles of track. The service area includes Harford County, Maryland; Baltimore City; Washington D.C.; Brunswick, Maryland; Frederick, Maryland and Martinsburg, West Virginia. MARC Train Service operates seven days a week on the Penn Line between Washington and Baltimore. Weekday Penn Line service continues north to Perryville. MARC Brunswick and Camden Line service operates Monday-Friday only; there is no weekend service on these two lines and trains do not operate on most federal holidays. MARC has an average of 36,540 weekday boarding's.

Mobility/Paratransit

Mobility/Para transit is a specialized, curb-to-curb service for people with disabilities who are not able to ride fixed-route public transportation, including lift-equipped buses. Mobility service is provided within three-quarters of a mile of any fixed-route service in Baltimore City and Baltimore & Anne Arundel counties.

The term "fixed-route" refers to Local Bus, Light Rail, or Metro Subway routes operated by the MTA. Mobility service is not offered within three-quarters of a mile of Commuter Bus or MARC Train routes. Mobility/Para transit service is provided by the MTA and operated via contracts with two Transportation providers.

**Maryland Transit Administration
Organizational Chart
12/05/13**

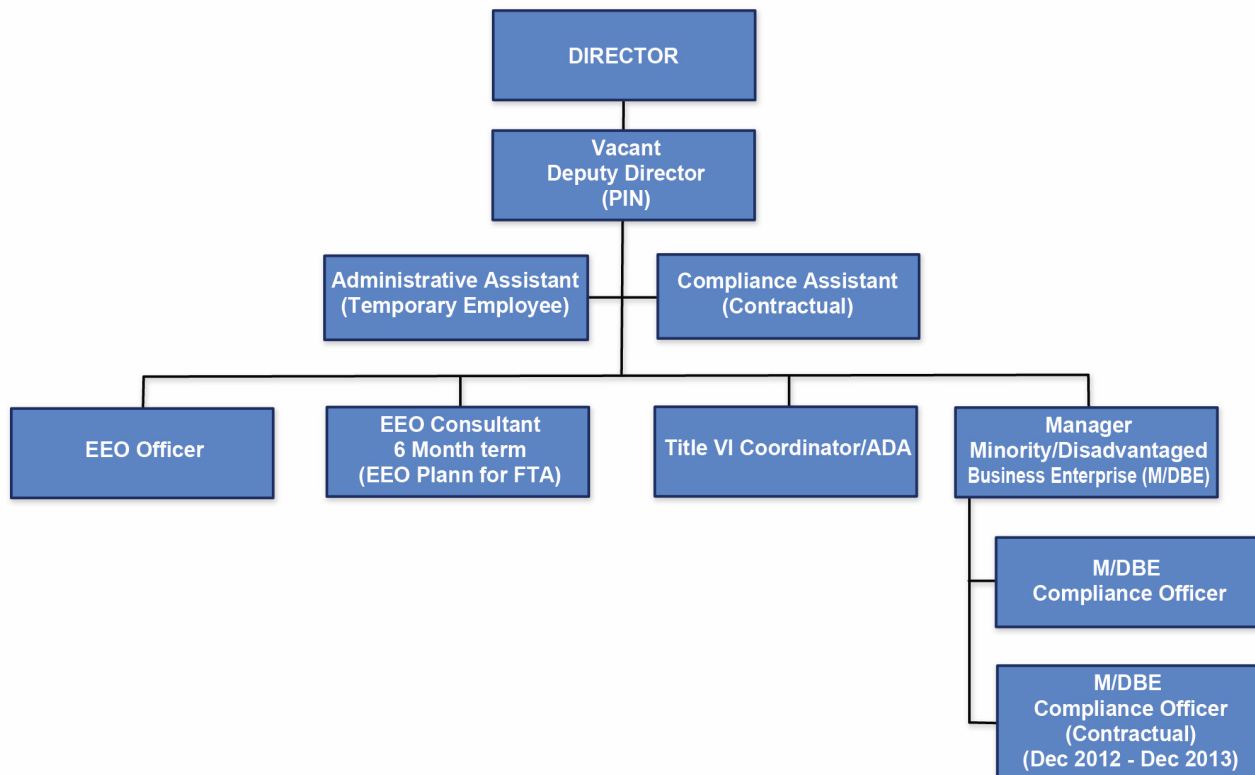


12/05/2013

VI. MTA Office of Fair Practices Overview

The Maryland Transit Administration's (MTA) Office of Fair Practices (OFP) is responsible for monitoring and enforcing MTA's internal and external programs to ensure compliance with appropriate federal and state laws and regulations. OFP is comprised of the following four (4) program areas: Title VI, Americans with Disabilities Act (ADA), Equal Employment Opportunity (EEO), and Minority Business Enterprise (MBE)/Disadvantaged Business Enterprise (DBE). Each area is assigned a Program Officer or Coordinator. For efficiency and continuity, the program officers are cross-trained to expand the scope of their respective knowledge, to strengthen the team concept, and to provide for consistent high-quality interchangeable program coverage and reporting.

Office of Fair Practices Organization Chart

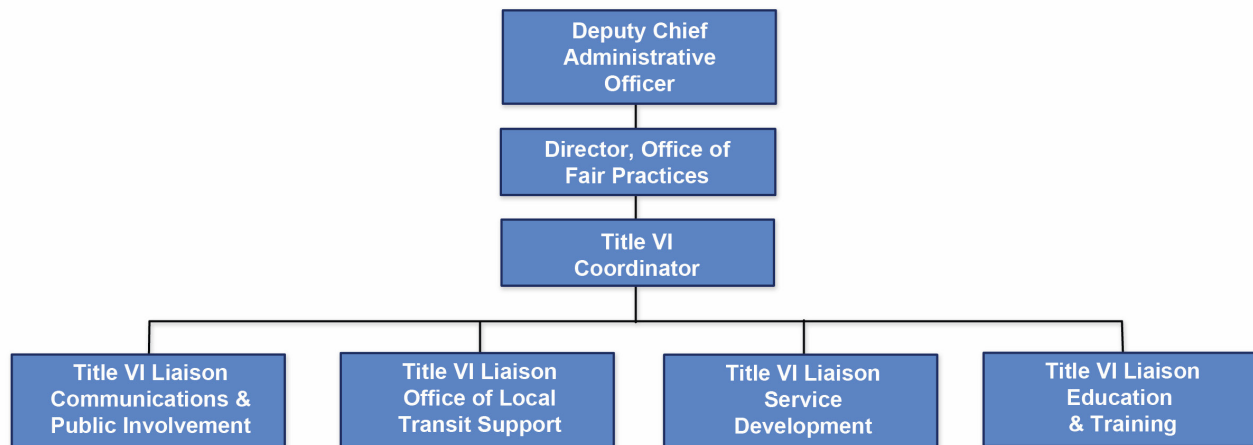


VII. Title VI Program Organization

Organization and Staffing – General

Under the authority of the Deputy Chief Administrative Officer the Director of the Office of Fair Practices is responsible for ensuring implementation of the agency's Title VI program. The Title VI Coordinator, under the supervision of the Director is responsible for coordinating the day-to-day and overall administration of the Title VI program and plan. The Title VI Liaisons works with the Title VI Coordinator ensuring that the Program Areas comply with Title VI.

MTA Title VI Organization Chart



Responsibilities of the Title VI Coordinator

- Responsible for ensuring MTA compliance with Title VI regulations in day-to-day administration and annual reporting
- Review important Title VI related issues with the Director of the Office of Fair Practices
- Conduct training on Title VI and associated statutes for MTA employees
- Attend MTA's Consumer Advisory Committee for Accessible Transportation (CACAT) Meetings:
 - a. To advise on Title VI compliance issues
 - b. Evaluate CACAT membership selection criteria in regards to race, gender and position within the committee to ensure equal participation
 - c. Attend other public meetings to assess and verify the level of participation of Title VI protected group members
- Record and Process Title VI Complaints
 - o Identify, investigate and propose ways to eliminate discrimination when found to exist within the programs and services of MTA
- Incorporate into MTA Title VI Plan any corrective actions taken in response to deficiencies found by FTA audit
- Perform periodic reviews of all transportation programs to ensure Title VI adherence
 - o Determine areas of concern in transit service operations and assist Operations Department with remedies
 - o Conduct Title VI reviews of consultant contractors
- Collect and maintain information & data required for general reporting to MTA, Maryland Department of Transportation (MDOT) and Federal Transportation Administration (FTA)
 - o statistical data (race, color, and national origin) of populations in Maryland
 - o statistical data on levels of transit service in minority population communities versus average levels of service
 - o conduct surveys and other events to determine perceived quality of transit service in minority communities. Analyze to determine if quality of service is consistent among different user groups and the degree to which the service is responsive to minority needs
- Develop Title VI information for dissemination to the general public and where appropriate in languages other than English
- Prepare a yearly report of Title VI accomplishments and projected goals
- Meet quarterly with Title VI Liaisons to discuss progress, implementation, and compliance issues
- Ensure that the all MTA outreach efforts are conducted with equal access and public participation. Work with assigned Title VI Liaison of that program area

Responsibilities of Title VI Liaisons

One Staff member from each of the Title VI Program Areas is assigned as the Title VI Liaison. Other staff members may be assigned to assist the Liaisons as needed. Under the guidance of the Title VI Coordinator, Title VI Liaisons are responsible for day-to-day administration of the Title VI program, including:

- Implementation of the plan and Title VI compliance
- Program monitoring, reporting, and education within the assigned program area (as described in the "Program Area Responsibilities" section of this document)
- Submitting data and documents to the Title VI Coordinator for the Annual Title VI Report and Update
- Reviewing guidelines and procedures for compliance
- Incorporating Title VI-related language and provisions into MTA's documents, as appropriate

In addition, Title VI Liaisons are responsible for implementing and maintaining the following elements in their assigned Program Area:

1. Data collection

Statistical data on race, color, national origin, income level, language spoken and sex of participants in and beneficiaries of federally funded programs. The data collection process will be reviewed regularly to ensure sufficiency in meeting the program requirements

2. Annual review of Title VI program

In preparation for the Annual Report and Update, review MTA's operational guidelines and publications, including those for contractors, to ensure that Title VI language and provisions are incorporated, as appropriate

3. Annual Report and Update

The document will include Title VI activities and efforts, accomplishments, relevant program changes, and updated Title VI goals and objectives for the coming year. Submission is due to the Title VI Coordinator at the end of October

4. Dissemination of information related to the Title VI program

Information on the agency's Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, and in other languages when needed

5. Resolution of complaints

Make a concerted effort to resolve complaints from any individual that believes they or any other program beneficiaries have been subjected to unequal treatment or discrimination, in their receipt of benefits/services or on the grounds of race, color, national origin, income, sex, or disability

Responsibilities of Title VI Liaisons (cont.)

6. Procedures Manual

An MTA Title VI program procedures manual, developed by the Title VI Coordinator, is given to each Title VI Liaison. The manual should be updated by the Liaisons, as necessary, to incorporate changes

VIII. Title VI Program Areas - General

Title VI affects all MTA targeted program areas activities at different degrees. The impact of these programs on minorities, the disabled, elderly and non-minorities are monitored to provide equitable treatment in the provision of benefits, services and opportunity to all recipients of the programs. This section of the plan identifies the four (4) MTA program areas, with which Title VI has the most impact and the responsibilities associated with it. Many of these program areas are inter-related and responsibilities may overlap. The specific areas of responsibility are described below.

Title VI Responsibilities for Program Areas

1. Communications & Public Involvement

The Communications & Public Involvement Program Area apply to the efforts and responsibilities related to all four Program Areas. The goal of MTA's communications and public involvement program is to ensure early and continuous public notification, actions and decisions by MTA and to seek public comment and review. MTA will always make a concerted effort to reach out to all segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes.

The Office of Public Affairs and Communications (PAC)

The Office of Public Affairs and Communications (PAC) Department provides and produces multimedia marketing and communications materials that promote Maryland Transit Administration (MTA). The PAC uses state-of-the-art multimedia resources and tools to position the MTA as one of the nation's premier public transit providers. Their services support the MTA's strategic mission to offer riders excellence in transportation, communication and public outreach.

The PAC coordinates cross-agency communications, maintains the MTA image, style guides and branding standards which promote the MTA as a contemporary public transit agency. Through innovative techniques, they support the MTA's efforts to attract riders and financial support, and to heighten awareness about the agency to both internal and external audiences. The long-term success of many of the MTA's initiatives will rest, in part, on their ability to communicate aggressively and comprehensively. The PAC provides a wide array of services.

Office of Public Affairs and Communications Services

Communications Functions

- Customer Surveys
- Brands, Style Guides and Templates
- Instructional DVDs
- Public Service Announcements
- Annual Report
- Social Media
- Web Design
- Newsletters
 - o Transit Lines
 - o On Your MARC
 - o Transit Today

Marketing Functions

- Brochures
- Maps
- Electronic Advertisements
- Publications
- Signage
- Strategic Planning
- Market Research
- Commuter Choice
- College Pass
- MTA Website

The Office of Customer Care and Community Outreach

The mission of the Office of Customer Care and Community Outreach is to advocate for external customers within the MTA Transportation System.

The office encompasses the Departments of Community Outreach and Customer Care.

The **Community Outreach's** mission is to facilitate a positive and productive conversation between Maryland communities and their residents, inform the community of MTA service developments and decision making while soliciting the support and ideas of the community through community-engaged efforts.

This Department serves as the direct contact to communities and businesses impacted by MTA services and decisions. Community Outreach is responsible for developing, implementing and broadcasting policies and procedures on a wide range of community related issues. This department establishes support and consultation structures to provide information, advice and assistance in resolving issues and concerns. Community Outreach ensures that the agency keeps a consistent presence in the community by coordinating MTA's attendance at community meetings, MTA-hosted community informational meetings, public hearings, as well as public outreach efforts. The Department also keeps communities informed and involved as MTA plans service expansions and contractions, as well as responds to community-initiated concerns regarding the agency.

Oversight of the **Core Services** also falls under direction of the Community Relations umbrella and includes:

Mail Services – Provides daily mail-service delivery to 14 MTA locations

Print Services – MTA Print Services is an in-plant facility responsible for providing a timely, effective and cost efficient system to meet the printing and copying needs of the MTA

Timetable Distribution – Is responsible for stocking Metro Stations, the 6 St. Paul Street Lobby and processes bulk orders for distribution

Infobox Program - Updates, repairs and installs InfoBoxes at major MTA service stops and transfer points

Customer Care - The Customer care section advocates for the customer regarding policies, service information, issues, commendations, and system-wide construction and rehabilitation projects.

This section coordinates the activities of the following:

- **Citizens Advisory Committees:** CAC, CACAT, and YCAC.
- **Special Events coordination**, such as the Maryland State Fair, African American Festival and Artscape.
- **Transit Ambassadors** for special events, service impacts, construction projects, Baltimore Ravens & Orioles games, and other major events such as the Grand Prix.
- **Free Speech requests**
- **Customer Care Agents/Infocom Comment Program**
- **Customer Care Agents** working to resolve ongoing customer issues.
- **InfoCom** program tracking customers' comments, commendations, suggestions
- **Transit Information Contact Center (TICC)** which receives more than 3.4 million calls annually

Title VI Public Involvement Form

This form is distributed and collected at all MTA Public Hearings as a mechanism for gathering statistical information on attendees to track how well different segments of the population are represented. It further addresses our commitment to ensuring that no person is excluded from participation in, or denied the benefits of transit services and programs on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. Meeting attendees are asked to voluntarily provide information about race, color, or national origin.



TITLE VI PUBLIC INVOLVEMENT FORM

The Maryland Transit Administration (MTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services and programs on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

To support this regulation, we ask that you voluntarily provide us information about your race, ethnicity and/or gender. You are not required to disclose the information requested in order to participate in this meeting or event.

The representatives at this meeting or event and the MTA's Office of Fair Practices will handle the information gathered in strict confidence. For further information regarding this process please contact Michele C. Gardner MTA's Title VI Coordinator by phone at 410-767-8837 or email: MGardner@mta.maryland.gov

Please respond to the following questions:

Project Name:		Date:
Location of Public Meeting or Event:		
Name (Optional) (Please print)		Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female
General Race Categories (Check as many as apply) <input type="checkbox"/> Black or African American <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> White/Caucasian <input type="checkbox"/> Native Hawaiian or other Pacific Islander <input type="checkbox"/> Latino/Hispanic <input type="checkbox"/> Other _____		
National Origin:		
<input type="checkbox"/> Individual with disability <input type="checkbox"/> Senior Citizen (65 years old or older)		

Thank you for your participation!

Revised 9/2013

TÍTULO VI DE PARTICIPACIÓN PÚBLICA

La Administración de Transporte de Maryland (MTA) está comprometida a asegurar que ninguna persona sea excluida de participar de los beneficios de los servicios de transporte y programas ni que éstos le sean negados en base a la raza, color o nacionalidad, conforme lo contempla el Título VI de la Ley de Derechos Civiles de 1964.

Para contribuir con ello, solicitamos que voluntariamente nos brinde información sobre su raza, etnia y/o sexo. No se exige que divulgue la información solicitada para poder participar de esta reunión.

El Oficial de Audiencias de la MTA y la Oficina de Prácticas Equitativas administrarán la información reunida con estricta confidencialidad. Para más información con respecto a este proceso comuníquese con Michele C. Gardner, Coordinadora del Título VI de la MTA al teléfono 410-767-8837 correo electrónico a: MGardner@mta.maryland.gov

Favor de responder las siguientes preguntas:

Nombre del proyecto:	Fecha:
Lugar donde se realizará la reunión pública:	

Nombre (Opcional) (Escribir en letra de molde)	Sexo: <input type="checkbox"/> Masculino <input type="checkbox"/> Femenino
Categoría general de raza (Marque todas las que correspondan) <input type="checkbox"/> Afroamericano <input type="checkbox"/> Indio Americano/Nativo de Alaska <input type="checkbox"/> Asiático <input type="checkbox"/> Blanco/Caucásico <input type="checkbox"/> Nativo Hawaiano o otro Isleño del Pacífico <input type="checkbox"/> Latino/Hispano <input type="checkbox"/> Otro _____	
Nacionalidad:	
<input type="checkbox"/> Persona con discapacidades <input type="checkbox"/> Ciudadano de la tercera edad (mayor de 65 años)	

¡Agradecemos su participación!

Revisado 9/2013

Typically MTA service and/or schedule changes are implemented around February 1; in June following the close of public schools; and late August coinciding with the opening of public schools.

Examples of Public Outreach - proposed Core Bus Route Changes:

1. Baltimore Sun Newspaper Ad (English)

MARYLAND TRANSIT ADMINISTRATION (MTA) NOTICE OF PUBLIC HEARINGS

The MTA gives notice of two public hearings regarding realignment of bus route No. 61 that may become effective on or about June 17, 2012. The proposed service adjustment would return the route to its previous alignment, traveling on Roland Avenue to a terminus at Bellemore Road. The public hearing schedule follows:

Tuesday, February 28, 2012 State Center Office Complex, Auditorium 300 West Preston Street Baltimore, MD 21201 Access via MTA Bus Nos. 19, 21 and 91; Metro Subway; and Light Rail 12:00 PM – 2:00 PM	Wednesday, February 29, 2012 Enoch Pratt Free Library, Roland Park Branch 5108 Roland Avenue Baltimore, MD 21210 Access via MTA Bus Nos. 27, 44, and 61. 5:00 PM – 7:00 PM
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Use of library meeting space does not constitute endorsement of this organization, this program or its content by the Enoch Pratt Free Library

The full text of the proposed service adjustments is available for public review in the lobby of the Wm. Donald Schaefer Building at 6 St. Paul Street, 21202 and at www.mta.maryland.gov.

Interested persons are invited to attend and express their views. Written statements may be submitted until 5:00 PM on Monday, April 2, 2012 to MTA, Office of Customer Service, 6 St. Paul Street, Baltimore, MD 21202. Alternatively, you may email your comments to MTAHearingRecord@mta.maryland.gov with "Hearing Comments" as the subject heading. Your name and postal address must be included with your comments to become part of the public hearing record.

All locations are accessible for people with disabilities. Anyone who requires special assistance or additional accommodations, or who requires printed material in an alternate format should contact MTA Office of Customer Information one week in advance at 410-767-3999 or TTY 410-539-3497.

For more information visit the MTA website at www.mta.maryland.gov; or call MTA Transit Representatives, Monday through Friday, 6:00 AM to 11:00 PM at 410-539-5000, 1-866-RIDE-MTA (1-866-743-3682), or TTY 410-539-3497.



Maryland Department of Transportation

www.mta.maryland.gov

2. El Tiempo Latino Newspaper Ad (Spanish)

ADMINISTRACIÓN DE TRÁNSITO DE MARYLAND AVISO DE AUDIENCIAS PÚBLICA

La Maryland Transit Administration (MTA) notifica por la presente dos audiencias públicas con respecto al reordenamiento de la ruta de autobús No. 61, que podría entrar en vigencia el 17 de junio de 2012. La modificación de servicio propuesta devolvería la ruta a su anterior recorrido, a lo largo de Roland Avenue hasta un terminal en Bellemore Road. A continuación se proporcionan las fechas y lugares donde se realizarán las audiencias públicas:

Martes, 28 de febrero de 2012

State Center Office Complex, Auditorium
300 West Preston Street
Baltimore, MD 21201
Acceso a través de los autobuses de la MTA No. 19, 21 y 91; el Subterráneo del Metro; y el tranvía
12:00 p.m. – 2:00 p.m.

Miércoles, 29 de febrero de 2012

Enoch Pratt Free Library, Roland Park Branch
5108 Roland Avenue
Baltimore, MD 21210
Acceso a través de los autobuses de la MTA No. 27, 44, y 61.
5:00 p.m. – 7:00 p.m.

El uso de la sala de reuniones de la biblioteca no constituye un respaldo a esta organización, este programa o a su contenido por parte de la Biblioteca Gratuita Enoch Pratt (Enoch Pratt Free Library)

El texto completo de las modificaciones propuestas del servicio está disponible para el público en el vestíbulo del Wm. Donald Schaeffer Building en 6 St. Paul Street, 21202 y en www.mta.maryland.gov.

Se invita a las personas interesadas a que participen y compartan sus opiniones. Se pueden presentar declaraciones por escrito hasta las 5:00 p.m. del lunes 2 de abril de 2012 a la MTA, Office of Customer Service, 6 St. Paul Street, Baltimore, MD 21202. Alternativamente, puede enviar sus comentarios por correo electrónico a MTAHearingRecord@mta.maryland.gov poniendo como asunto "Comentarios a las audiencias". Es necesario que incluya su nombre y dirección postal junto con sus comentarios para que puedan incluirse en el registro de la audiencia pública.

Todos los lugares son accesibles para personas con discapacidades. Cualquier persona que necesite ayuda especial o servicios adicionales, o material impreso en un formato alternativo, deberá comunicarse con la oficina de Información al Cliente de MTA la con una semana de anticipación, llamando al 410-767-3999 o TTY 410-539-3497.

Para obtener mayor información visite la página web de la MTA: www.mta.maryland.gov; o llame a los Representantes del Tránsito de la MTA, de lunes a viernes, de 6:00 a.m. a 11:00 p.m. al 410-539-5000, 1-866-RIDE-MTA (1-866-743-3682), o TTY 410-539-3497.



www.mta.maryland.gov

Newspaper Ad Notices - Mobility Services Informational Sessions

El Tiempo Latino Newspaper (Spanish)

ADMINISTRACIÓN DE TRÁNSITO DE MARYLAND (MARYLAND TRANSIT ADMINISTRATION, MTA) AVISO DE REUNIONES INFORMATIVAS DEL SERVICIO DE MOVILIDAD

La MTA realizará una serie de reuniones informativas (Open House) en las cuales estará disponible el personal de Movilidad para conversar sobre las políticas de no presentación y elegibilidad condicional, capacitación para viajes y ajustes realizados al Servicio de Movilidad. Se exhibirán mapas con la reestructuración del área de servicio de Movilidad que entrará en vigencia en o aproximadamente el 7 de mayo de 2012 para cumplir con las normas federales.

A continuación encontrará el programa de las reuniones informativas:

Lunes, 5 de marzo de 2012

Towson Library
320 York Road
Towson, MD 21204
6:00 PM a 8:00 PM

Martes, 6 de marzo de 2012

Randallstown Library
8604 Liberty Road
Randallstown, MD 21133
6:30 PM a 8:00 PM

Martes, 13 de marzo de 2012

MAA, Martin State Airport
Hanger 4, Lower Level Classroom
701 Wilson Point Road
Middle River, MD 21220
6:00 PM a 8:00 PM

Jueves, 15 de marzo de 2012

Catonsville Senior Center
501 N. Rolling Road
Catonsville, MD 21228
6:00 PM a 8:00 PM

Lunes, 19 de marzo de 2012

North Point Library
1716 Merritt Boulevard
Dundalk, MD 21222
6:00 PM a 8:00 PM

Martes, 20 de marzo de 2012

Timber Grove Elementary School
Cafeteria
701 Academy Ave.
Owings Mills, MD 21117
6:30 PM a 8:30 PM

Jueves, 22 de marzo de 2012

State Center Auditorium
300 West Preston Street
Baltimore, MD 21201
6:00 PM a 8:00 PM

Martes, 27 de marzo de 2012

Pascal Senior Center
125 Dorsey Road
Glen Burnie, MD 21061
6:00 PM a 8:00 PM

Todas las ubicaciones son accesibles para las personas con discapacidades. Para obtener mayor información y para alguna persona que requiera asistencia especial o modificaciones adicionales, o que necesita material impreso en un formato alternativo debe ponerse en contacto con la MTA, Servicio de Movilidad para Clientes una semana antes llamando al 410-764-8186, 410-764-8004, o a MD Relay Service: 711; o mobilitycomments@mta.maryland.gov.



www.mta.maryland.gov

Baltimore Sun Newspaper (English)

MARYLAND TRANSIT ADMINISTRATION (MTA) NOTICE OF MOBILITY SERVICE INFORMATIONAL SESSIONS

The MTA will conduct a series of Informational Open House sessions where Mobility staff will be available to discuss the No-Show and Conditional Eligibility policies, Travel Training, and adjustments to Mobility Service. Maps will be on display showing the realignment of the Mobility service area that will become effective on or about May 7, 2012 to comply with federal regulations.

The informational meeting schedule follows:

Monday, March 5, 2012

Towson Library
320 York Road
Towson, MD 21204
6:00 PM – 8:00 PM

Tuesday, March 6, 2012

Randallstown Library
8604 Liberty Road
Randallstown, MD 21133
6:30 PM – 8:00 PM

Tuesday, March 13, 2012

MAA, Martin State Airport
Hanger 4, Lower Level Classroom
701 Wilson Point Road
Middle River, MD 21220
6:00 PM – 8:00 PM

Thursday, March 15, 2012

Catonsville Senior Center
501 N. Rolling Road
Catonsville, MD 21228
6:00 PM – 8:00 PM

Monday, March 19, 2012

North Point Library
1716 Merritt Boulevard
Dundalk, MD 21222
6:00 PM – 8:00 PM

Tuesday, March 20, 2012

Timber Grove Elementary School
Cafeteria
701 Academy Ave.
Owings Mills, MD 21117
6:30 PM – 8:30 PM

Thursday, March 22, 2012

State Center Auditorium
300 West Preston Street
Baltimore, MD 21201
6:00 PM – 8:00 PM

Tuesday, March 27, 2012

Pascal Senior Center
125 Dorsey Road
Glen Burnie, MD 21061
6:00 PM – 8:00 PM

All locations are accessible for people with disabilities. For more information and for anyone who requires special assistance or additional accommodations, or who requires printed material in an alternate format should contact MTA, Mobility Customer Service one week in advance at 410-764-8186, 410-764-8004, or MD Relay Service: 711; or mobilitycomments@mta.maryland.gov.



www.mta.maryland.gov

3. Car Card - Core Bus and Light Rail





TITLE VI

Committed to fair and equal practice.

The Maryland Transit Administration is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services under Title VI of the Civil Rights Act of 1964.

If you believe you have been subjected to unequal treatment because of **race, color, or national origin**, then you have the right to file a formal complaint. Complaints may be filed within one hundred-eighty (180) days following the date of the alleged discriminatory action by mail, telephone, or by web. To file a complaint by mail, send to: Office of Fair Practices, Maryland Transit Administration, 6 St. Paul Street, Baltimore, Maryland 21202. To file a complaint by phone, call 410-767-3944 or by web at www.mtamarlyland.com (click "Contact Us").

For additional information call 410-767-3944 or visit www.mtamarlyland.com.

Comprometidos con un trato imparcial e igualitario.

La Administración de Tránsito de Maryland está comprometida a asegurarse que ninguna persona sea excluida de participar de los beneficios en los servicios de tránsito o que éstos le sean negados, en conformidad con el Título VI de la Ley de Derechos Civiles de 1964.

Si usted cree que ha sufrido un trato desigual debido a su **raza, color o nacionalidad**, tiene derecho a presentar una queja formal.

Las quejas se deberán presentar dentro de los ciento ochenta (180) días después de la fecha de la presunta acción discriminatoria por correo postal, teléfono o entre en la página web. Para someter una queja, escriba a: Office Of Fair Practices, Maryland Transit Administration, 6 St. Paul Street, Baltimore, Maryland, 21202; para someter una queja por teléfono, llame al 410-767-3944 o entre en la página web: www.mtamarlyland.com (oprima "contact us").

Para mayor información llame al 410-767-3944 o visite www.mtamarlyland.com.



Title VI Communications & Public Involvement Liaison Responsibilities:

- Ensure all communications and public involvement efforts comply with Title VI
- Distribute Title VI and agency programs information to the general public. Ensure all vital information documents are translated in languages other than English
- Disseminate information to minority media and ethnic/gender related organizations to make certain that all social, economic, and ethnic interest groups in the MTA service area are represented in the planning process
- Include the abbreviated *Title VI Notice to the Public* in all press releases, and notices
- Notify affected, protected groups of public hearings regarding proposed actions and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified. This would also include materials in alternative formats upon request
- Ensure that any Citizen Advisory Committee MTA creates has representation from Title VI relevant populations.

2. Planning & Programming

Office of Local Transit Support

The Maryland Transit Administration's (MTA) Office of Local Transit Support (OLTS) is responsible for the administration, management and technical assistance of a number of Federal funding programs - FTA Sections 5305 Planning Assistance, 5307 Urbanized Area Formula Program, 5309 Capital Investment Program, 5310 Elderly and Persons with Disabilities Program, 5311 Non-urbanized Area Formula Program, 5311(f) Intercity Bus, RTAP Rural Transit Assistance Program, 5316 Job Access and Reverse Commute - JARC, 5317 New Freedom, ADA American Disabilities Act, United We Ride, Ride Sharing, and the recently approved legislation – MAP-21 Moving Ahead for Progress in the 21st Century Act, signed into law by President Obama on July 6, 2012. These programs support both public transportation and specialized transportation services. OLTS also administers several State funding programs such as the Statewide Specialized Transportation Assistance Program (SSTAP) and the Senior Rides Program (SRP).

The functions of administering these grants are performed by Regional Planners under the direction of the Director of OLTS. Regional Planners are staff representatives in the OLTS who provide administrative oversight and technical support to the Locally Operated Transit Systems (LOTS) and non-profit organizations that receive Federal and State funding. Regional Planners divide responsibilities for the Baltimore, Washington, Southern Maryland, Western Maryland and Eastern Shore, Maryland regions. Regional Planners also work with the local Metropolitan Planning Organizations (MPO).

Map of Six Statewide Regions



The Maryland Transit Administration (MTA) on behalf of the Maryland Department of Transportation (MDOT) has lead responsibility for the administration and oversight of Federal Transit Administration (FTA) grant funding that is passed through to local units of government and non-profit organizations. Primary responsibility for the administration and oversight activities related to the sub recipient resides in the MTA's Office of Local Transit Support (OLTS). This responsibility includes decisions regarding the distribution of funds as well as program regulatory compliance oversight. The following process is applied to sub recipients who receive funds for FTA Federal funding programs. On issues specifically pertaining to Title VI, OLTS staff will work with members of MTA's Office of Fair Practices to ensure sub recipients' compliance with FTA regulations.

OLTS Program Management

Statewide Transportation Planning Process

Each sub recipient develops and maintains a demographic profile of its jurisdiction that includes identification of the locations of socioeconomic groups, including low-income and minority populations as covered by the Executive Order on Environmental Justice and Title VI.

Additionally, the OLTS staff collects demographic profiles of the jurisdictions through the statewide transportation planning process. The statewide transportation planning process is conducted as a compilation of several different existing planning processes. Each local jurisdiction that operates public transit services is required to have a Transportation Development Plan (TDP). The planning process used to develop this document specifically works to identify the needs of low-income and minority populations within each jurisdiction. Secondly, as specified in the Federal authorizing legislation for the Sections 5310, 5316 and 5317 programs, the MTA has completed a locally developed, coordinated public transit-human services transportation plan for each region in Maryland with the exception of the Washington Region in which the programs are administered by the Metropolitan Washington Council of Government. These documents comprehensively look at unmet transportation needs of individuals with disabilities, older adults, and people with low incomes specifically those seeking employment and/or employment-related activities. These documents are supplemented with input and data received during other planning process such as the development of our Consolidated Transportation Plan (CTP), the Maryland Comprehensive Transportation Plan (MTP), Transportation Improvement Program (TIP), and Statewide Transportation Improvement Program (STIP). Together these documents will serve as our primary planning tools from which programming decisions and the development of our Program of Projects (POP) will be made.

Program Administration

NOTE: With the passage of MAP-21 in 2012, the OLTS's program administration process that is documented below is subject to change once final guidance is received from FTA.

Competitive Project Selection Process

Maryland employs two different project application and selection processes for Sections 5310, 5316 and 5317 programs. Projects are selected as a result of the process detailed below:

Governor Orders

By Executive Order of the Governor of the State of Maryland two different committees have been established to assist in the project selection process of Sections 5310, 5316 and 5317 programs.

The **Intra-Agency Committee on Specialized Transportation (ICST)** is comprised of special appointees from the cabinet level departments within the Maryland State government and is charged with making funding recommendations for Section 5310.

The **State Coordinating Committee for Human Services Transportation (SCCHST)** is comprised of special appointees from the cabinet level departments with the Maryland State government, plus representatives from other local and regional entities that have a vested interest in human service transportation.

Section 5310 Program

Each local application must be submitted to the local planning office by the deadline indicated in the application package. An approved planning certificate must be received from the local planning office and/or regional coordinating body by the next deadline as indicated in the application schedule. An approved Local Planning Certificate is needed in order for the application to be considered complete.

The completed application with the signed Local Planning Certificate is then submitted to the regional Metropolitan Planning Organization (MPO) or other coordinating body for regional review.

The regional MPOs/Coordinating bodies are as follows:

- Baltimore Metropolitan Council (BMC): Annapolis, Baltimore, Carroll, Cecil, Harford, and Howard Counties and Baltimore City
- Metropolitan Washington Council of Governments (MWCOC): Frederick, Montgomery, and Prince George's Counties
- Maryland Upper Shore Transit (MUST): Caroline, Dorchester, Kent, Queen Anne's, and Talbot Counties
- Tri-County Council for the Lower Eastern Shore of Maryland (TCC): Somerset, Wicomico, and Worcester Counties
- Tri-County Council for Southern Maryland (TCCSMD): Calvert, Charles, and St. Mary's Counties

The regional planning and coordinating bodies review and prioritize the applications within their region to ensure coordination. These regional bodies then bring their recommendations to the State Coordinating Committee for Human Services Transportation (SCCHST) for endorsement. All Section 5310 applications require sign-off by the SCCHST. Only applications which have met the local and regional submission deadlines are considered for funding by the ICST.

Recipients for funding are selected from the applications received during the annual solicitation process. MTA does not use a formula nor impose any limitations on the use of funds. Projects are selected based on the established criteria used by the ICST. Each of the members of the ICST reviews the applications and evaluates them, based on the information presented in the application according to the established criteria.

After each member of the ICST has reviewed and scored each application, the ICST holds a meeting to review and discuss each complete application. Each application is then scored and ranked by the ICST. Using the rank order, the ICST proceeds to award vehicles and other equipment starting with the highest-ranked organization. Vehicles are awarded until the fiscal year's Section 5310 funds have been completely allocated.

The selection process, coupled with the program announcement process described in the following section, provides for a broad and equitable approach for selection of recipients for Section 5310 funds that meets the requirements of Title VI. The MTA tracks participation of minority organizations in the Section 5310 program. Minority Business Enterprises and organizations which serve minority communities are self-identified on the application forms. The MTA and the ICST monitor the percentage of award grants that minority organizations receive in comparison to the percentage of minority organization applications.

S. 5316 - Job Access and Reverse Commute (JARC) & S. 5317 - New Freedom Programs

Project funding applied through JARC and New Freedom programs are selected through a statewide competitive review and selection process. A Regional Coordinating Committee has been established in each of the four regions with the Baltimore Regional Transportation Board (BRTB) as the fifth region responsible for reviewing the local application submissions. All of the proposed projects will be scored based on the selection criteria defined in the JARC & New Freedom application.

Eligible applications within each geographic region are evaluated and scored for the following criteria:

- 1. Local Needs – Project Goals/Objectives (up to 20 points)**
- 2. Coordination and Cooperation (up to 25 points)**
- 3. Implementation Plan (up to 15 points)**
- 4. Management Capability (up to 15 points)**
- 5. Fiscal Capability (up to 15 points)**
- 6. Program Effectiveness (up to 10 points)**

Each JARC and New Freedom application will be scored up to a maximum of 100 points, based upon the score for each of the six criteria.

To be eligible for funding, projects funded through the JARC and New Freedom Programs “must be derived from a locally developed, coordinated public transit-human services transportation plan”. Each of the five statewide regions developed coordinated public transit-human service transportation plans that 1) identified the transportation needs of individuals with disabilities, older adults, and people with low incomes, 2) provided strategies for meeting those local needs, and 3) identified potential projects that correspond to each strategy.

Eligible applications within each geographic region are evaluated and scored. The Regional Coordinating Committees in the rural and small urban areas then forward the projects that they endorse and meet the standards set forth within the region’s Coordinated Public Transit-Human Services Transportation Plan to the State Planning Subcommittee of the SCCHST. The State Planning Subcommittee assists MTA with recommendations for which projects should be awarded grants, based on the same scoring criteria employed by the regional committees. The BRTB has a slightly different process in which a subcommittee similar to the Regional Coordinating Committees reviews the applications and makes recommendations to the BRTB. MTA works closely with BRTB to finalize awards.

Although each applicant may apply for funding for more than one project, it is possible awards could be made for one proposed activity and not another. Furthermore, projects may not be fully funded up to the dollar amount requested on the application.

The selection process, coupled with the program announcement process described in the following section, provides for a broad and equitable approach for selection of recipients for Section 5316 and Section 5317 funds that meets the requirements of Title VI.

The MTA tracks participation of minority organizations in these programs. Minority Business Enterprises and organizations which serve minority communities are self-identified in the program compliance section of the application.

Sections 5307, 5309 and 5311 Programs

Each County within the State of Maryland has a designated public transit operator. As outlined in the MTA’s State Management Plan, the MTA only provides sub recipient funding to local units of governments. The process used to distribute funds among the county is as follows:

Each sub recipient is required to submit an Annual Transportation Application (ATP) to the MTA each year. MTA’s Office of Local Transit Support (OLTS) reviews each application for completeness and accuracy. OLTS staff works directly with each applicant to gain a thorough knowledge of the projects requested in the ATP. Funding recommendations are broken down into two separate categories, (1) Operating and (2) Capital. Recommendations for FTA funding to support operating costs are based on maintaining existing transportation levels of effort across the State. Maintaining existing transportation levels of service delivery exhausts the amount of funds available each year. No Federal funds are used to develop new service. Recommendations for FTA funding to support capital projects in each local jurisdiction are based on the following priority: 1- Capital needs that directly support existing services (items such as replacement vehicles, vehicle maintenance and bus replacement parts) receive priority; and 2- Capital items that support administrative and operation functions are given second priority (items such as computer equipment, passenger stop amenities, and facility improvements fall into this category).

Title VI requires that an equitable distribution of funds to sub recipients serving predominantly minority and low-income populations is achieved through the MTA's on-going monitoring of each local government's compliance with Title VI requirements as they operate existing services and the planning process detailed in the section above. As demographic changes are identified in the planning processes or public input identifies deficiencies in the existing levels of service delivery relative to minority and low-income populations, the OLTS Staff will work directly with the sub recipient to identify changes to their exiting services to better accommodate these needs. If the sub recipients fail to make appropriate service adjustments, this dynamic will be given consideration as funding recommendations are developed.

Once a funding recommendations list has been refined, it is forwarded to MTA Administrator for review and approval. The MTA Administrator is authorized by the Secretary of Maryland's Department of Transportation to make final project recommendation approvals and to submit applications to the FTA.

Criteria for Selecting Transit Providers to Participate in FTA Grant Programs

The MTA will only award grant funding to local units of government or eligible non-profit agencies. As discussed above, the criteria for selecting transit provides to participate in FTA Sections 5310, 5316, and 5317 programs is a function of the application process. There are no restrictions placed on who may apply for the funds. Transit provider selection is strictly a function of the merits of the proposed project.

In regards to the Sections 5307, 5309, and 5311 programs, the MTA will only award funds to local units of government for the delivery of open door general public transportation services.

Procedure to Assist Potential Applicants

Prior to awarding program funding, the MTA's OLTS conducts annual outreach to make the public aware of the availability of FTA funding. The OLTS maintains a data base of potential applicants which are mailed announcements to these annual regional application meetings. Several methods are utilized to publicize grant programs and application meetings. Mailings are sent to private non-profit organizations, state or local governmental bodies and operators of public transportation services. The five Regional Coordinators post the information on their transit websites and also through their professional email lists. The OLTS hosts regional meetings to distribute application packages, provide general guidance on how to complete the application and if necessary provide one-on-one counseling on the application requirements.

Example – Announcement JARC & New Freedom Application Meetings (FY 2014 - 2015)



**Job Access and Reverse Commute/New Freedom Programs
Application Meetings
Fiscal Years 2014 & 2015**

Region	Date	Time	Location
Baltimore Baltimore City, Anne Arundel, Baltimore, Carroll, Harford, and Howard Counties	Friday, June 22, 2012	10:00 am – Noon	Baltimore Metropolitan Council Offices @ McHenry Way, Suite 300 1500 Whetstone Way, Suite 300 Baltimore, MD 21230-4767 Directions can be found at http://www.baltometro.org/contact-us/directions-to-bmc
Western MD Allegany, Frederick, Garrett, Washington Counties	Tuesday, June 26, 2012	10:00 am – Noon	Allegany College of Maryland of MD 12401 Willowbrook Road Continuing Education Building – Room CE-6 Cumberland, MD 21502 Directions can be found at http://www.allegany.edu/x457.xml
Southern MD Calvert, Charles, St. Mary's Counties	Wednesday, June 27, 2012	9:30 am – 11:30 am	Southern MD Electric Co-Operative (SMECO) Auditorium 15035 Burnt Store Rd. Hughesville, MD 20637 Directions can be found at www.tccsmd.org
Upper Shore Caroline, Cecil, Dorchester, Kent, Queen Anne's, Talbot Counties	Thursday, June 28, 2012	10:00 am – Noon	Chesapeake College 1000 College Circle Kent Humanities Building – Room 8103 Wye Mills, MD 21679 Directions can be found at www.chesapeake.edu
Lower Shore Somerset, Wicomico, Worcester Counties	Friday, June 29, 2012	10:30 am – 12:30 pm	Tri-County Council Multi Purpose Center One Stop Job Market (across from the Wor Wic Community College) 31901 Tri-County Way, Meeting Room O12 Salisbury, MD 21804 Directions can be found at http://www.onestopjobmarket.org

Monitoring Subrecipients

Applicants selected for Federal funding enter into a grant agreement with the MTA.

Applicants are required to provide detailed Title VI information to MTA on usage and performance of the project. The Title VI Investigations, Complaints & Lawsuit Log which is used to provide this detailed information is submitted to the MTA's Office of Local Transit Support staff along with a Request for Payment form quarterly. These quarterly reports will include financial and program measures updates.

The MTA ensures that sub recipients establish and maintain compliance with Title VI requirements through the following activities:

- Annual submittals; all sub recipients are required to sign an assurance document which is compliant with 49 CFR Section 21.7(a) and submit it to the MTA with their annual funding application. MTA staff reviews this documentation for completeness and accuracy.
- Any sub recipient who is applying for and or receiving funding for the first time is required to submit to the MTA information regarding their Title VI compliance history if they have previously received funding from another Federal agency. This shall include a copy of any Title VI compliance review activities conducted in the last three years. The summary should include: A- The purpose or reason for the review. B- The name of the agency or organization that performed the review. C- A summary of the findings and recommendations of the review. D- A report on the status and/or disposition of such findings and recommendations. This information should be relevant to the organizational entity actually submitting the application, not necessarily the larger agency or department of which the entity is a part. This submittal shall be made to the MTA prior to any funding being awarded. MTA staff reviews this documentation for completeness and accuracy. Any concerns identified as part of this review will be investigated fully prior to the awarding of FTA funds.
- Each sub recipient shall notify the MTA in writing about any complaints, lawsuits or FTA administrative activity within 3 business days of their knowledge of these actions. If the MTA receives such a notification, the MTA will immediately notify the FTA. OLTS staff will be assigned to assist in the full investigation of the issue. If necessary, OLTS staff will then provide technical assistance to the sub recipient to assist in the development of corrective actions and monitor the implementation of those corrective actions
- At a minimum, each sub recipient shall produce public notice outreach to inform the public of the sub recipient's Title VI obligations, apprise members of the public of the protections against discrimination afforded to them by Title VI, notifies the public that the sub recipient certifies that they are in compliance with these requirements, and explains how the public can access the sub recipient's complaint process. Documentation of this effort shall be submitted to the MTA once a year, through the annual transportation plan (ATP) process. The sub recipients make their application available for public review and comment prior to the submission of the application to the MTA. MTA staff reviews this documentation for completeness and accuracy.
- **Transportation Development Plan (TDP)** – Sub recipients for Sections 5307, 5311, and 5309 funding are required to have a TDP. These plans are updated on a five year cycle. As part of the TDP update, a critical assessment of the sub recipient's Title VI obligations and their ability to meet these requirements is conducted. This planning effort also serves as a

tool to develop current and accurate data to identify locations of clusters of minority and low-come populations. OLTS staff provides technical assistance and guidance directly to sub recipient staff as the planning update process is conducted.

- **Annual application submittals** - Each year all sub recipients are required to submit a funding application. OLTS staff conducts a thorough and extensive review of each funding application. This review includes validating that all required documents are submitted and completed properly. This review also includes a subjective analysis of the project scope and the applicant's adherence to FTA requirements (Title VI requirements are part of this analysis). Applicants are also asked to submit printed material such as schedules, brochures, and other public outreach material including LEP documents as part of their application. This material is reviewed by OLTS staff for Title VI compliance.

Each year the LOTS must submit a grant application called the Annual Transportation Plan (ATP). There are different thresholds for compliance based on population and amounts of FTA funds received. Each year the sub recipients are required to submit documentation which defines what thresholds they need to meet in terms of Title IV compliance. Also, the sub recipients for the Sections 5310, 5316, and 5317 programs submit annual/bi-annual applications that document what thresholds they need to meet in terms of Title VI compliance. See following page for the sections of the annual questionnaire pertaining to Title VI submitted by sub recipients.

A. CIVIL RIGHTS

Do you employ 50 or more transit-related employees (including temporary, full-time or part-time employees either directly and/or through contractors)?

☐ YES ☐ NO

How much State/Federal funding did you receive in FY 2012?

Is the amount of State/Federal funds received in FY 2011 more than \$1 million in capital or operating assistance or more than \$250,000 in planning assistance?

☐ YES ☐ NO

If "Yes" to both questions, provide two (2) copies of your EEO plan.

If your organization does not have an MTA approved EEO plan, please contact your Regional Planner.

The State and any sub recipients that receive funds from FTA for planning, capital, or operating assistance or any combination thereof in excess of \$250,000 to award in prime contracts, NOT including funds for transit vehicle purchases, in a given Federal Fiscal Year must prepare a DBE program.

Is the amount of State/Federal funds received in FY 2012 for planning, capital, operating assistance or any combination thereof more than \$250,000?

☐ YES ☐ NO

If "Yes", please provide two (2) copies of your approved DBE program.

If your organization does not have an MTA approved DBE plan, please contact your regional planner.

If your project received less than \$250,000, do you have an MTA approved DBE plan?

☐ YES ☐ NO

If "No", when do you anticipate submitting a plan for MTA approval?

Do you have a purchase of service agreement with a private operator?

☐ YES ☐ NO

If "Yes", please provide two (2) copies of the contractor's EEO Plan AND their MBE Plan.

Do you have an approved Title VI Plan?
☐ YES ☐ NO

If "Yes", has your Title VI Plan been approved by MTA?
☐ YES ☐ NO

Date of Approval

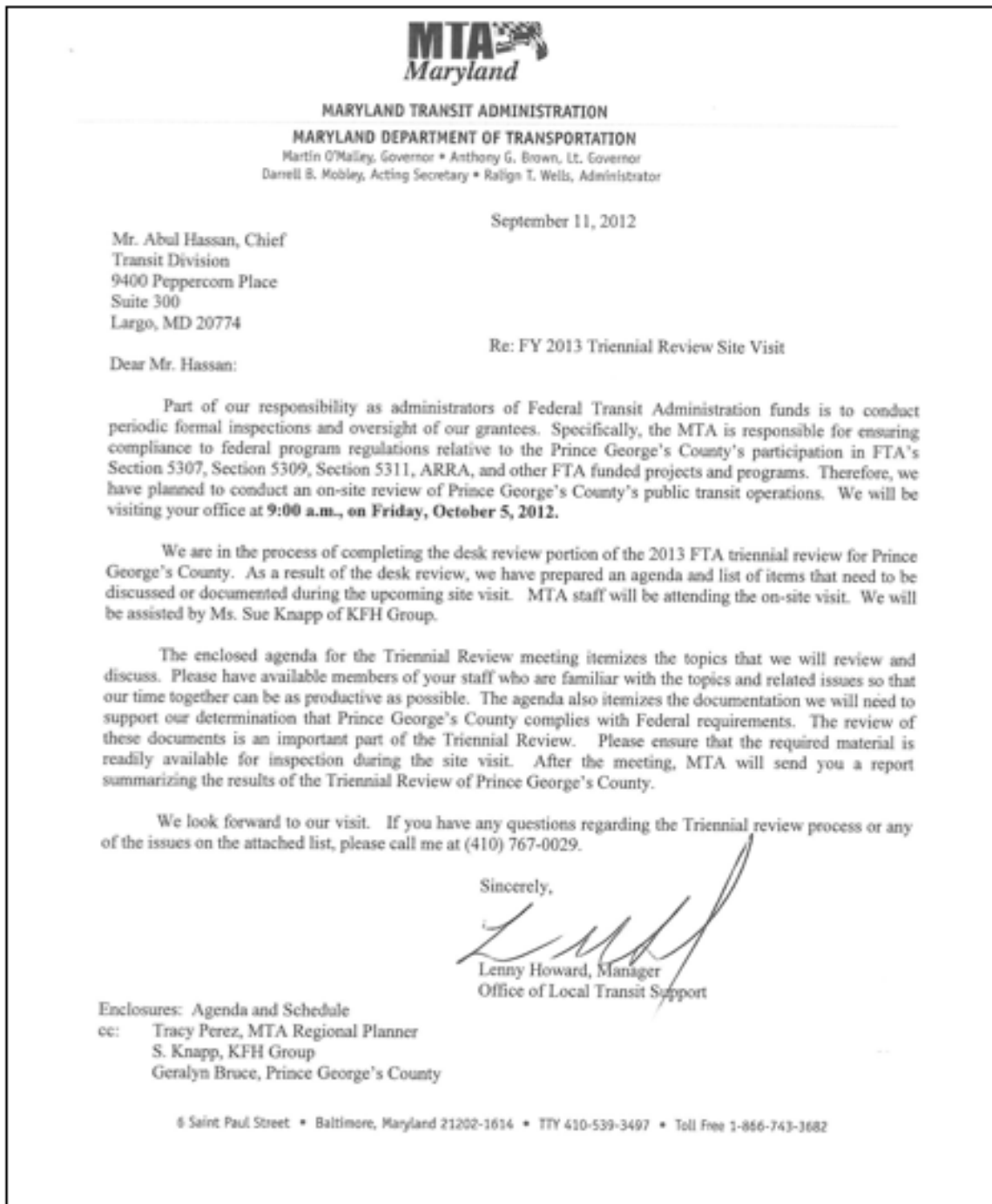
Are you in a census area with a population in excess of 200,000?
☐ YES ☐ NO

Please provide two (2) copies of your most recent Title VI Plan

MTA Use Only Office of Local Transit Support	
Reviewed By: _____ <div style="text-align: center; font-size: small;">Name</div>	_____ <div style="text-align: center; font-size: small;">Date</div>

- **Site visits** - OLTS staff is quarterly or as needed on site at sub recipients' facilities as part of our continuing and on-going technical assistance and monitoring. During these visits staff is looking for visual indications of Title VI compliance. Additionally, as MTA staff interacts with sub recipient's staff they will monitor for indications that the sub recipients have understating and are adhering to Title VI requirements.

Once every three years, OLTS does a detailed site compliance audit and site visit. **See below for the short version of the letter sent to the sub recipients.** The letter announces the visit and what is expected. **The six documents that follow pertain to the Title VI and ADA sections.**



Attachment A

Triennial Review Schedule for
Prince George's County

Date: **Friday, October 5, 2012.**

<u>TIME</u>	<u>AREA OF REVIEW</u>
9:00 - 9:15	Entrance Conference
9:15 - 9:30	Legal, Charter Bus, School Bus
9:30 - 10:15	Financial
10:15 - 10:45	Technical, NTD
10:45 - 11:15	ADA, Title VI, EEO, DBE
11:15 - 12:00	Satisfactory Continuing Control
12:00 - 1:00	Lunch
1:00 - 2:00	Procurement, Buy America, Suspension and Debarment, Lobbying, IT Infrastructure
2:00 - 3:00	Planning/Program of Projects, Public Comment on Fare and Service Changes, E&H Half Fare
3:00 - 3:30	Security/Safety, Drug Free Workplace
3:30 - 4:00	Wrap-Up/Exit Conference

Each recipient of a grant shall have complied with the public participation requirements of Section 5307 (c) (1) through (7). Each recipient is required to develop, publish, afford an opportunity for a public hearing on and submit for approval a Program of Projects (POP).

Please be prepared to discuss the following questions:

1. How does Prince George's County participate in the metropolitan transportation planning process?
2. Have any deficiencies been identified in the COG planning certification?
3. How is private transportation providers included in the planning process?
4. Explain Prince George's County's process for developing its ATP/POP, as well as for publishing and involving the public in the ATP/POP process.
5. How does the ATP/POP provide for coordination with transportation services assisted from other Federal sources?

Please have available a copy of the following documents during the scheduled site visit.

1. Any agreements between the County and COG regarding your respective roles in the MPO planning process
2. Description of the public involvement mechanisms in place including sample published notices of public hearings.

12. Title VI

Grantees must ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program, or activity receiving federal financial assistance. The grantee must ensure that federally supported transit services and related benefits are distributed in an equitable manner.

Please be prepared to discuss the following questions:

1. Who is responsible for the coordination of Title VI, environmental assessments and program submissions? Who prepares the Title VI program submissions and updates for submission to MTA?
2. Does Prince George's County have a current Title VI program on file with FTA or MTA? Please have available your Title VI program (required since Annapolis is in an urbanized area with a population over 200,000)?
3. Did Prince George's County conduct an environmental assessment for Title VI during the past three years? If yes, do you have the analysis to show how minority communities were addressed?
4. Has Prince George's County assessed and addressed the ability of persons with limited English proficiency (LEP) to use transit services? Are schedules and other public information provided in languages other than English? If yes, what languages are provided?

5. Has Prince George's County had any Title VI complaints or lawsuits during the past three years?

Please have available a copy of the following documents during the scheduled site visit.

1. The current Prince George's County Title VI program, if you have one.
2. Samples of public timetables, maps, and other public information in a language other than English.

13. Public Comment on Fare/Service Changes

The grantee must have a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation.

Please be prepared to discuss the following questions:

1. What are Prince George's County written procedures for obtaining comments in a public forum prior to fare increases and major service reductions?
2. Has Prince George's County had a fare increase and/or a major service reduction during the past three years? If yes, be prepared to discuss how public comments were incorporated into the process.

Please have available a copy of the following documents during the scheduled site visit.

1. Written procedures for public comment on fare increases and major service reductions.
2. Published announcement of public hearings, if any.
3. Transcripts or Minutes of public hearings, if any.

14. Half Fare

Grantees must ensure that elderly persons and persons with disabilities, or an individual presenting a Medicare card, will be charged during non-peak hours for transportation using or involving a facility or equipment of a project financed under Section 5307 not more than 50 percent of the peak hour fare.

Please be prepared to discuss the following questions:

1. How are persons with disabilities certified?
2. During what hours are reduced fares for the elderly and persons with disabilities available?
3. Is a special identification card for persons with disabilities required to obtain a half fare? If so, how is such an identification card obtained? Is a Medicare card sufficient identification for receiving half-fare?
4. Is the half fare requirement included with other fare information on schedules (including reference to the use of Medicare cards)?
5. Is there any service on which the half fare is not applicable?

Please have available a copy of the following documents during the scheduled site visit.

1. Copy of current system brochure/map/schedule.
2. Special brochures for half fare program, if any.

15. **Americans with Disabilities Act**

Title II and Title III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of complementary paratransit service.

Please be prepared to discuss the accessibility of the system, compliance with 504/ADA, and the following issues and questions.

1. Are the Prince George's County facilities accessible?
2. Since the last review, has Prince George's County constructed new facilities or altered any existing facilities used for providing public transportation?
3. Do all new buses acquired (purchased or leased) since the last review comply with the Part 38 accessibility standard?
4. Please be prepared to demonstrate and explain how Prince George's County has implemented the following service provisions required by the ADA regulations
 - Maintenance of accessible features
 - Procedures to ensure lift availability
 - Lift and securement use
 - Announcement on vehicles of major stops, transfer points, etc.
 - Vehicle identification mechanisms
 - Service animals
 - Use of accessibility-related equipment and features
 - Public information/communications available in accessible formats
 - Lift deployment at all stops
 - Service to persons using respirators or portable oxygen
 - Adequate time for vehicle boarding/disembarking
5. If the Brown Route still serves as Prince George's County's ADA complementary paratransit service:
 - How are potential riders notified that the services is available?
 - Does the Brown Route meet the following ADA Complementary paratransit requirements?
6. Have vehicle operators received equipment and sensitivity training?

Please have the following documents available for our examination during the scheduled site visit.

1. Driver handbooks, notices, written procedures, etc. describing accessibility procedures including stop announcements, lift use, service animals, etc.
2. Any complaints from disabled persons regarding non-compliance with ADA requirements.
3. ADA rider brochures and eligibility certification materials.

16. Charter Bus

FTA grantees are prohibited from using Federally funded equipment and facilities to provide charter service except on an incidental basis and when one or more of applicable exceptions set forth in the charter service regulation at 49 CFR 604.9(b) applies. (Note: Two of the seven exceptions apply to only non-urbanized areas.)

Please be prepared to discuss the following questions:

1. Is any charter service being operated with Prince George's County vehicles? If so, be prepared to discuss and substantiate which exceptions to the charter prohibition apply in your case.
2. Have any complaints been filed alleging violations in charter service operations? Have they been upheld?

17. School Bus

FTA grantees are prohibited from providing exclusive school bus service unless it qualifies under specified exceptions. In no case can Federally funded equipment or facilities be used.

Please be prepared to discuss the following questions:

1. Is any exclusive school bus service being operated with Prince George's County vehicles? If so, does it qualify for one of the statutory exceptions and is it operated with non-Federally funded equipment and facilities?

SUBRECIPIENT COMPLIANCE

- Training - The MTA provides sub recipients with a program manual. A discussion of Title VI requirements is included in this document. Additionally, the MTA hosted several mandatory training sessions to present various FTA program requirements, including Title VI.
 - o November 11, 2011, the MTA's Office of Local Transit Support hosted a FY 2012-2013 Grantee Meeting for those awarded grants through the Sections 5316 and 5317 programs. The session that covered the Title VI & Equal Employment Opportunity (EEO) program requirements was presented by the MTA's Title VI/ADA Coordinator and the EEO Coordinator.
 - o November 19, 2012, the MTA's Office of Local Transit Support, through the Maryland Rural Transportation Assistance Program (RTAP), hosted a mandatory training course for Sections 5307, 5311, 5316 and 5317 sub recipients on meeting transit system responsibilities under Title VI of the Civil Rights Act of 1964. MTA's Title VI/ADA Coordinator gave a brief overview of the new Title VI Circular 4702.1B requirements and how they affect the LOTS. The Title VI/ADA Coordinator also distributed a Title VI Circular Reference Sheet.
- **SEE APPENDIX G - Subrecipient Compliance-Title VI Program Submissions**
- Compliance Audits: On a triennial basis each sub recipient is scheduled to receive a comprehensive site visit and compliance review by MTA staff. These reviews are conducted to assure all relevant FTA program regulations are being followed and implemented by our sub recipients. Title VI compliance is part of this review process. While on site staff will physically review any written policy documents and records sub recipients may have on file relevant to Title VI including LEP programs and complaint policy and procedures. Sub recipients will be charged with correcting any deficiencies identified during these audits. MTA staff will work directly with sub recipients to provide technical assistance and ensure the corrective actions are implemented in a timely manner.

**Maryland Transit Administration
Subrecipient Oversight Activities
LOTS Compliance/Triennial Review Schedule**

Systems	Previous Review	Next Review
Allegany County Transit	January 31, 2011	January-14
Annapolis Transit	February 17, 2011	February-14
Baltimore County Ride	August 24, 2010	March-14
Calvert County Transportation Division	July 27, 2010	March-14
Caroline/Talbot/Kent Counties - DCT	March 23, 2010	August-14
Carroll Transit Services	November 16, 2010	December-13
Cecil County Department of Aging	November 8, 2011	July-14
Charles County - VanGo	November 12, 2009	September-14
Central MD Regional Transit - CMRT (JARC & Cap only)	August 17, 2011	TBD
Dorchester County - DCT	March 23, 2010	August-14
Fredrick Transit	August 16, 2010	January-14
Garrett Transit Services	May 23, 2011	April/May 2014
Harford County Transportation Service	December 1, 2010	February-14
Howard Area Transit Service	December 16, 2010	April-14
Montgomery County - RIDE ON	July 13, 2010	November-13
Ocean City Transit	December 2, 2010	November-13
Prince George's County - THE BUS	October 5, 2012	September-15
Queen Anne's County Ride	October 1, 2012	September-15
Shore Transit (LS-TCC)	November 22, 2010	December-13
St. Mary's Transportation Service	October 4, 2012	October-15
Washington County Commuter	October 9, 2012	October-15

10/10/2013

Office of Planning - Environmental Planning Division

The Environmental Planning Division (EPD) administers MTA compliance with the National Environmental Policy Act (NEPA) and all related environmental compliance in accordance with state and federal laws and regulations, and in cooperation with appropriate state and federal agencies including the Federal Transit Administration, Maryland Departments of the Environment and Natural Resources, and others. The EPD provides liaison with state and federal agencies, elected officials, and the general public and local businesses regarding projects undergoing NEPA review. The EPD also coordinates with state and federal agencies for projects that involve wetlands, water quality, hazardous materials, cultural resources, bicycle and pedestrian programs, and air quality conformity in accordance with state and federal regulations.

The EPD conducts an EJ analysis as part of the NEPA analysis and documentation for all transit projects that receive, or may receive federal and/or state funding. EPD's general procedures for conducting an EJ analysis follow the guidance provided in FTA Circular 4703.1 (Environmental Justice Policy Guidance for Federal Transit Administration Recipients) in order to:

1. Identify EJ populations using demographic data,
2. Develop a targeted public engagement plan,
3. Determine disproportionately high and adverse human health or environmental effects, and
4. Avoid, minimize, or mitigate effects any high and adverse effects.

Specific EJ analysis procedures are modified for and adapted to individual projects depending upon their scope and size.

The EPD and MTA strive to achieve meaningful public engagement with EJ populations to identify social, economic, and environmental impacts of a proposed project. Public engagement helps us identify the transit needs of EJ populations, identify benefits and burdens of proposed projects, and identify mitigation measures. Public outreach and involvement strategies are tailored to engage in a meaningful public dialogue with the EJ population(s) potentially impacted by the plan, project, or decision.

Public engagement strategies often include traditional approaches such as public meetings and workshops. Careful attention is paid to providing effective notice and location and timing to ensure that meetings are convenient and accessible to all, particularly persons with disabilities or those who do not speak English well or at all. We also utilize non-traditional approaches such as informal group meetings, digital media, direct mail campaigns, community led events, or building partnerships with community-based organizations and leaders.

Determination of Site or Location of Facilities

The Maryland Transit Administration has not had any projects requiring land acquisition and the displacement of persons from their residences or businesses that took place without a NEPA document during the reporting period 2011-2014.

Capital Project Approval Process

In regards to capital construction projects, all projects must complete a NEPA study before any construction funding can be spent. The NEPA study is typically conducted during the preliminary planning or site selection process. The NEPA study includes an Environmental Justice (EJ) analysis to ensure that low-income or minority communities are not disproportionately impacted by the construction of a transit facility. The EJ analysis involves an evaluation of maps and demographic data to identify any EJ populations in the project area. Public outreach is conducted to ensure low-income and minority communities are properly identified, engaged, and given an opportunity to participate in project development. Various approaches to outreach and engagement are outlined in FTA Circular 4703.1 (Environmental Justice Policy Guidance for Federal Transit Administration Recipients). When the EJ analysis and outreach are completed, the results are documented in the NEPA document which may be a categorical exclusion, environmental assessment, or environmental impact statement. The completed NEPA document is submitted to the appropriate federal funding agency, typically the Federal Transit Administration for review. The federal agency issues an approval letter to MTA if it finds that all Title VI, EJ, and other environmental compliance considerations have been met and adequately documented.

3. Service Development Department

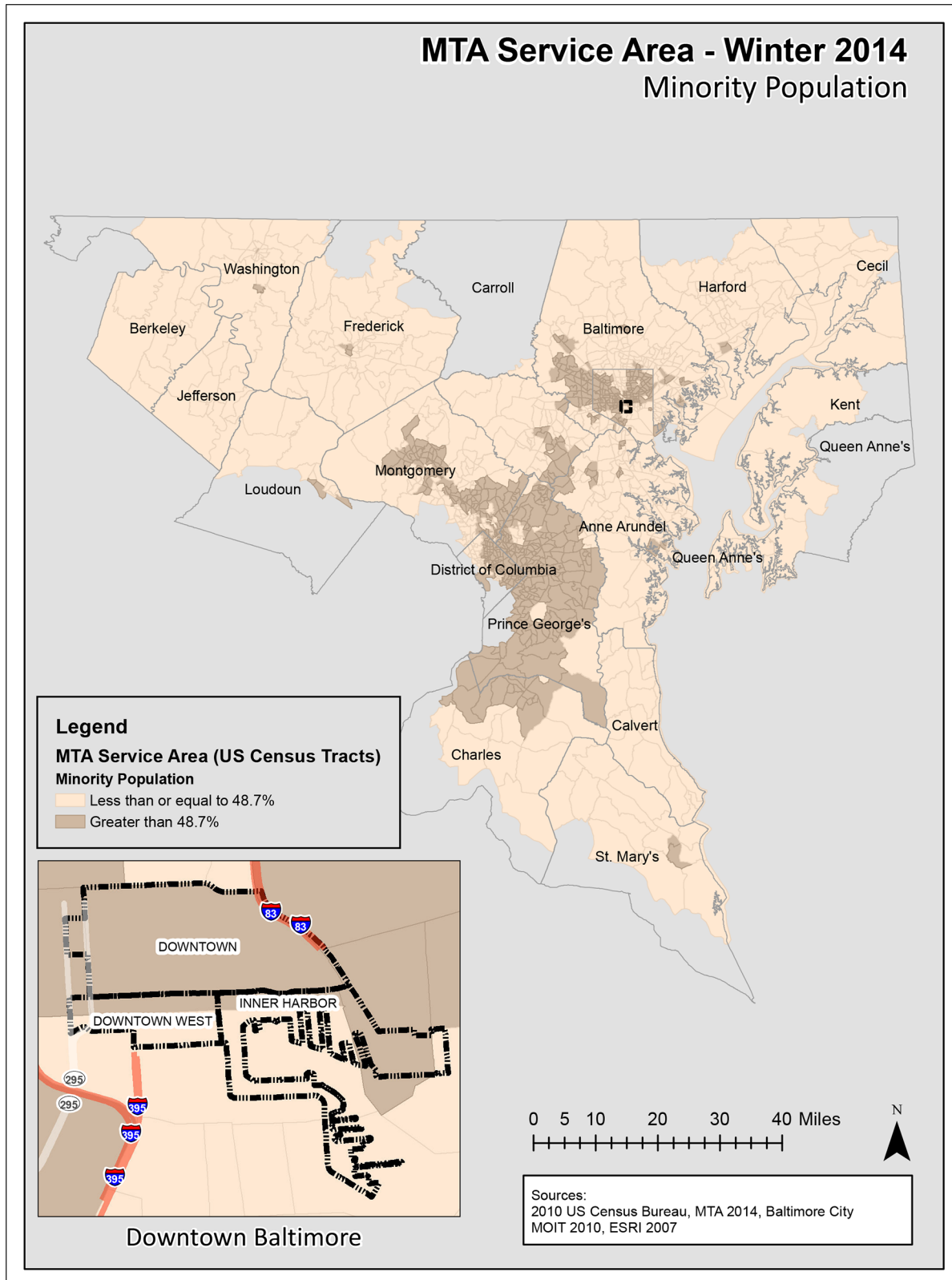
Demographic Data Collection

MTA will collect demographic data and analyze the potential impact on minority communities. The Service Development department will prepare demographic and service profile maps and charts. The maps and charts will be used to determine whether transit service is available to minority and low-income populations within MTA's service area; to identify transit routes and other transit facilities within the MTA service area; as well as to highlight the demographic characteristics of each of the census tracts within the route service area. The routes and facilities maps will be generated for all modes run by the MTA. Data on the demographic maps will include the location of specific populations or communities identified for inclusion in Title VI, including census tracts that are majority minority or majority low income. The contents of the map will act as a foundation for completing a number of the required compliance assessments on its adopted service standards.

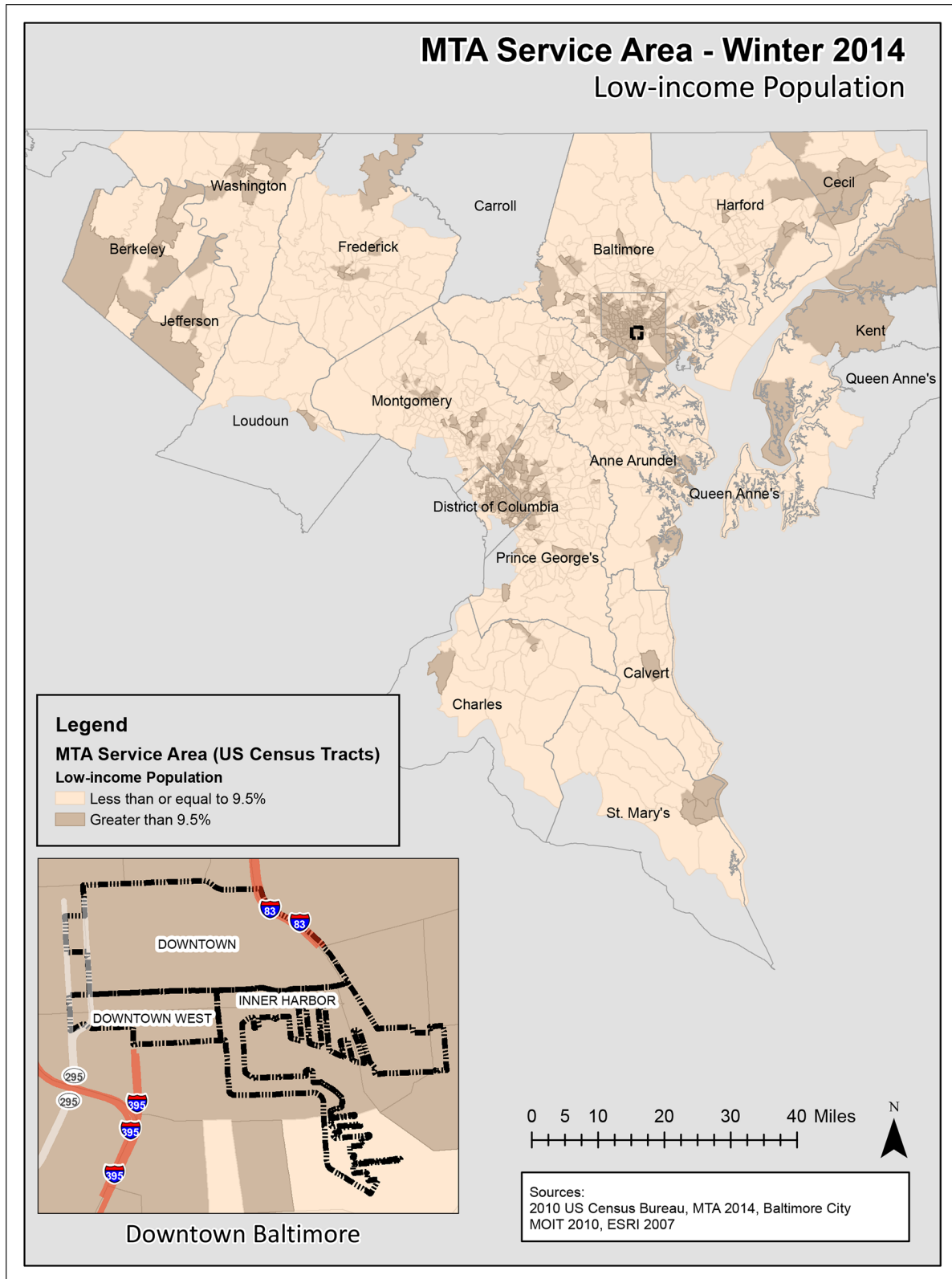
MTA will prepare maps and charts each time we proposed service reductions or eliminations of service and also when new census data becomes available. The map will have MTA's service area that includes each Census tract or traffic analysis zone, major streets and highways, fixed transit facilities (including the alignment of fixed guide ways and transit stations, maintenance and garage facilities, and administrative buildings) and major activity centers or the central business district, outlying high employment areas, schools, and hospitals). MTA will highlight those transit facilities that were recently modernized or are scheduled for modernization in the next five years. It will also include information; Census tracts and traffic analysis zones where the percentage of the total minority and low-income population residing in these areas exceeds the average minority and low-income population for the service area as a whole.

The maps will be completed utilizing Geographic Information Systems (GIS). The demographic data and census tract boundaries are available from the Census Bureau web site. The route system and other transit facilities would come from existing map overlays completed by the MTA. Additional map features such as maintenance facilities that may not currently be in a map overlay will to be generated by MTA staff. In addition to the Census Bureau, the Baltimore Metropolitan Council maintains demographic and census data for the region and these data may be updated more often than every 10 years. If this data is available the MTA may wish to generate maps utilizing this data as a supplement to census data. Once the demographic maps are completed each route in the MTA system should be categorized based on the income and demographic status of the Census Tracts the route runs through. The first step in completing this categorization will to be to count the number of census tracts each route passes through. The second step will be to count the number of census tracts that are majority minority or majority low income. These numbers can then be used to calculate the percentage of the entire route service area that is majority minority.

Service Area Map: Title VI - Minority Population



Service Area Map: Title VI – Low Income Population



MTA Title VI Policy Analysis Methodology

There are two components to the MTA Title VI Analysis. The first involves identifying a catchment area for each mode and proportionally summing race and poverty information from the 2010 Census Tracts to each catchment area. The analysis uses the same catchment areas defined in the 2012 MTA Fare Equity Analysis, unless noted otherwise.

Minority data is derived from U.S. Decennial Census 2010 Summary File 1 Table P5, "HISPANIC OR LATINO ORIGIN BY RACE." Total Minority is calculated by summing "Not Hispanic Black," "Not Hispanic American Indian," "Not Hispanic Asian," "Not Hispanic Native Hawaiian," "Not Hispanic Some Other Race Alone," "Not Hispanic Two or More Races," and "Hispanic or Latino." Total Minority Population is then divided by Total Population in each Census Tract to determine percent minority status. Poverty data is derived from the American Community Survey 2007-2011, 5-Year Estimate Table S1701, "POVERTY STATUS IN THE PAST 12 MONTHS." The percentage of the population living under poverty is calculated by dividing "Below Poverty Level" by "Total Population Estimate" for each Census Tract.

The second component of the analysis involves defining the service area for each mode based on the aggregate of the catchment areas. The service areas are made up of all 2010 Census Tracts that intersect each modal catchment area. The only exception to this method is the service area identified for local bus, which is explained in further detail below. The total service area is the aggregate of all the modal service areas and replicates the Census Tracts identified in the 2012 MTA Fare Equity Analysis.

The following sections describe how the catchment areas were defined for the purposes of the Title VI analysis. The service area for local bus is also explained as it is the only service area that is not the aggregation of Census Tracts that intersect the modal catchment area.

Local Bus

Catchment Area

There are 60 local bus routes, excluding Route 120 and Route 160, both of which are classified as Express Routes. Each of the 60 routes were buffered at a quarter mile radius and proportionally summed based on the area of the buffer that intersects neighboring tracts.

Service Area

The MTA has an established definition for their core service area for local bus. The agency identifies the service area through 2000 Census Tracts. For the purposes of this analysis, the 2000 Census Tract definition was converted to 2010 Census Tracts. Table 1 identified any assumptions made in converting 2000 Tracts to 2010 Tracts whenever a Tract was split.

Table 1 – Converting 2000 Census Tracts to 2010

County	Tract 2000	Tract(s) 2010		
003	7305.03	7305.06	7305.05	
003	7402.02	7514		
003	7505	7512		
003	7506	7512		
003	7507	9800		
027	6012.02	6012.03	6012.04	
005	4015.01	4015.06	4015.07	
005	4016.01	4925		
005	4016.02	4925		
005	4024.01	4024.07	4024.06	
005	4025.07	4924.02	4924.01	4025.09
005	4034	4034.01	4034.02	
005	4041	4041.01	4041.02	
005	4044.01	4044.04	4044.03	
005	4083.01	4083.03	4083.04	
005	4113.04	4113.09	4113.08	
005	4301.02	9801	4301.04	
005	4506	4923		
005	4507	4923		
005	4514	4514.01	4514.02	
005	4522	9800		
005	4917.01	4917.01		
005	4917.02	4926		

Metro

Catchment Area

There are 14 stations on the Metro subway. The GIS point file obtained from MTA had 28 records, two for each station to represent southbound and northbound. To ensure stations were not double counted, only the southbound stations were buffered to create a catchment area and the northbound stations were dropped. Any station with a PNR facility was buffered according to the distances recommended in the 2012 Fare Equity Analysis and all other stations were buffered at a distance of 0.5 mile. Table 2 identifies the buffer distances used for each station with a PNR facility.

Table 2 – Metro PNR Facility Buffer Distance

Station Name	Recommended Distance/ Catchment Area (in miles)
Milford Mill	5
Mondawmin	5
Old Court	5
Owings Mills	5
Reistertown Plaza	5
Rogers Average	5
West Cold Spring	5

Light Rail (LRT)

Catchment Area

There are 33 stations on the MTA Light Rail Line. The GIS point file obtained from MTA had 37 records. The file was cleaned to ensure one record for each station in each direction was retained. Any station with a PNR facility was buffered according to the distances recommended in the 2012 Fare Equity Analysis and all other stations were buffered at a distance of 0.5 mile. Table 3 identifies the buffer distances used for each station with a PNR facility.

Table 3 – LRT PNR Facility Buffer Distance

Station Name	Recommended Distance/ Catchment Area (in miles)
Baltimore Highlands	0.5
BWI Business District	10
Cromwell/ Glen Burnie	10
Falls Road	5
Hunt Valley	10
Lutherville	5
Mount Washington	5
North Avenue	5
North Linthicum	10
Nursery Road	10
Patapsco Ave	5
Timonium	5
Warren Road	10

MARC

Catchment Area

There are 41 stations on the MARC Line. The GIS point file obtained from MTA had 80 records. The file was cleaned to ensure one record for each station in each direction was retained. Any station with a PNR facility was buffered according to the distances recommended in the 2012 Fare Equity Analysis. Two stations, Camden Station and College Park, were buffered at the 0.5 mile distance. Table 4 identifies the buffer distances used for all MARC stations.

Table 4 – MARC PNR Facility Buffer Distance

Station Name	Recommended Distance/ Catchment Area (in miles)
Barnesville	10
Boysd	5
Brunswick	10
Dickerson	10
Duffields	10
Frederick	10
Gaithersburg	5
Garrett Park	2
Germantown	5
Harpers Ferry	10
Kensington	2
Martinsburg	10
Met Grove	5
Monocacy	10
Pt of Rocks	10
Rockville	2
Silver Springs	2
Washington Grove	2
Camden Station	0.5
College Park	2
Dorsey	10
Greenbelt	10
Jessup	10
Laurel	5
Muirkirk	5
Riverdale	5
Savage	10
St. Denis	5
Aberdeen	10
Bowie State	5
BWI	10
Edgewood	5

Station Name	Recommended Distance/ Catchment Area (in miles)
Halethorpe	10
Martin St. Airt	5
New Carrollton	5
Odenton	5
Penn Station	5
Perryville	10
Seabrook	5
W. Baltimore	5
Union Station DC	0.5

Express Bus Catchment Area

There are two bus routes that are considered express service, the 160 and the 120. The 2012 Fare Equity Analysis identifies two PNR facilities, one on each route. Both stops were buffered at a 5 mile radius, as described in Table 4.

The MTA exported all of the bus stops that serve these two routes in a spreadsheet. There were 276 records in the spreadsheet. The stops were brought into GIS using the lat/long provided. All westbound stops for Route 160 and all northbound stops were preserved for Route 120 (as identified in the "DirectionName" field). The two PNR facility stops were removed from each file. 47 regular stops were buffered at 0.5 miles for Route 160 WB and 29 regular stops were buffered at 0.5 miles for Route 120NB.

Table 4 – Express Bus PNR Facility Buffer Distance

Station Name	Recommended Distance/ Catchment Area (in miles)
Essex	5
Whitemarsh PNR	5

Commuter Bus Catchment Area

The MTA operates 24 commuter bus routes. The 2012 Fare Equity Analysis identifies 42 PNR facilities for commuter bus. Table 5 describes the buffer radius used to create a catchment area for each PNR facility. The following PNR facilities are no longer active and were dropped from this analysis: Bel Air MVA, Carney PNR, Gardenville PNR, and South Baltimore PNR. Additionally, there are 17 Park N' Ride facilities listed in MTA's stop database that were not included in the 2012 Fare Equity Analysis. These 17 PNR facilities were buffered at a two mile radius.

Table 5 – Commuter Bus PNR Facility Buffer Distance

Station Name	Recommended Distance/ Catchment Area (in miles)
Bel Air MVA	2
Bristol	10
Broken Land	5
Burtonsville	10
California	10
Carney	5
Charlotte Hall	10
Chesapeake Church	10
Cheyenne	5
Clarksville	2
Dunkirk	10
Equestrian Ctr	10
Fallston	5
Gardenville	5
Hagerstown	10
Harry S Truman	10
Hickory	5
Juniata	5
Kent Narrows	10
La Plata	5
Long Gate	10
Marywood	2
Mattawoman-Bntn	5
Monocacy	10
North Beach	2
Pindell	10
Prince Frederick	2
S. Baltimore	2
S. MD Stadium	2

Station Name	Recommended Distance/ Catchment Area (in miles)
S. Potomac Church	10
Scaggsville	10
Smallwood Village	2
Snowden River	5
St Charles Dicks	5
St Charles JCP	5
St Charles Towne Plz	2
St Leonard	10
Stevensville	10
Sunderland	10
Urbana	1
US 301	5
Waysons Corner	10

The MTA exported all of the bus stops that serve the 24 commuter routes in a spreadsheet. There were 876 records in the spreadsheet. The stops were brought into GIS using the lat/long provided. For each route, an origin and a destination were determined based on AM Peak schedule information posted online at: <http://mta.maryland.gov/commuter-bus>. Table 6 identifies the AM origin for each commuter bus route. Once in GIS, the commuter bus stop file was cleaned to ensure one record for each station in each direction was retained. All PNR facilities were deleted from the GIS stop file as well as any stops identified as “destination” stops. The remaining 134 commuter bus stops were buffered at a 0.5 mile radius.

Table 6 – Commuter Bus AM Peak Direction and Origin/Destination Stops

Route Number	Origin	Destination	AM Direction
201	Gaithersburg PNR	BWI	EB
202	Gaithersburg PNR	Fort Meade	EB
203	Columbia	Bethesda	SB
204	Frederick	College Park	SB
205	College Park	Germantown	NB
310	Columbia	Johns Hopkins	NB
320	Downtown Baltimore	Jessup/Columbia	SB
410	Churchville	Downtown Baltimore	SB
411	Hickory	Johns Hopkins	SB
420	Havre de Grace	Johns Hopkins	SB
901	La Plata	DC	NB
902	St Leonard	DC	NB
903	Waldorf	DC	NB
904	Pindell	DC	NB
905	Waldorf	DC	NB
906	Waldorf	DC	NB
907	La Plata/Waldorf	DC	NB
909	CA	DC	NB
915	Columbia	DC	SB
922	Annapolis	DC	WB
929	Columbia	DC	SB
950	Annapolis	DC	WB
991	Hagerstown	Shady Grove	SB
995	Clarksville	DC	SB

System Wide Service Standards

Vehicle Load

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 55 passengers for Hybrid 40-foot buses, 66 passengers for standard 40-foot standard, 96 passengers for Hybrid 60-foot standard, 55 passengers for 45-foot buses commuter bus, 174 passengers for 95-foot Light Rail Car, 166 passengers for 75-foot Metro Car, & 129 average passenger for 85-foot MARC Train Car. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total seated and standing capacity by the seated capacity of the vehicle.

Table 1				
Types of Local Bus	Seated	Standing	Total	Maximum Load Factor
40' Standard Bus	43	23	66	1.3
40' Hybrid Bus	38	17	55	1.3
60' Hybrid Bus	64	32	96	1.3

Table 1 shows passenger capacities for local bus as the average maximum number of persons seated and standing during the peak one-hour in the peak direction.

Table 2				
Rail Type	Seated	Standing	Total	Maximum Load Factor
Light Rail	84	90	174	2.1
Metro Car	76	90	166	2.2

Table 2 shows passenger capacities light rail and metro cars.

Table 3				
Vehicle Type	Seated	Standing	Total	Maximum Load Factor
Commuter Bus	55	0	55	1
CommuterRail (MARC)	127	0	127	1

Table 3 shows passenger capacities for Commuter bus and Commuter Rail.

Vehicle Headway

Scheduling involves the consideration of the number of factors including: ridership productivity, transit/pedestrian friendly streets, density of transit-dependent population and activities, relationship to MTA Service Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

MTA local bus operates service every 60 minutes on its trunk lines while metro and light rail every 30 minutes or better seven days a week. On weekdays' hours, majority of local, metro and light rail service is scheduled to operate at least every 20 minutes; beginning approximately 6:00 a.m. through 7:00 p.m. Commuter Bus and MARC train operates Monday to Friday every 60 minutes or better from early morning to evening. On December 13, 2013, MARC train will begin weekend service, headway will soon be detriment.

Assessment: Average weekday loads on each line determined for the following time periods and directions of travel

Route type	Minimum span	Minimum peak period frequency	Minimum midday frequency	Minimum evening frequency	Saturday and Sunday	Owl service?
Radial	4 AM—12 AM	20	30	30	60	Few
Crosstown	6 AM—10 PM	20	30	30	60	Few
Feeder	6 AM—9 PM	30	60	60	60	No
Circulator	6 AM—9 PM	30	60	60	60	No
Express	Peak Hours	15	N/A	N/A	N/A	No
Quick Bus	Peak Hours	15	N/A	N/A	N/A	No
Commuter	Peak Hours	60	N/A	N/A	N/A	No
Metro	5 AM – 12 AM	8	10	8	15	No
Light Rail	5 AM – 12 AM	10	15	20	30	No
MARC Train	5 AM – 9 PM	30	*	35	TBA	No

***MARC train has three trains operating on one line during midday**

Headways for Local Bus

LineAbbr	LineName	Early	Am Peak	Base	PM Peak	Late	Saturday Peak	Sunday Peak
001	SINAI - FORT McHENRY	30	20	35	20	40/60	40	60
003	SHEPPARD PRATT/ CROMWELL- DOWNTOWN	15	10	15	12	25/60	15	30
004	TURNERS STATION - C C B C ESSEX	60	40	60	40	60	60	60
005	MONDAWMIN - CEDONIA	30	15	15	15	15/30	25	30
007	MONDAWMIN - CANTON	30	30	35	30	45	35	30
008	LUTHERVILLE - UMTC	17	15	11	15	25/45	15	30
009	LUTHERVILLE- INTERNATIONAL CIRCLE	30	20	30	20	60	35	60
010	RT. 40/ROLLING - BULLNECK RD.	15/30	15/30	15/30	15/30	15/30	15	30
011	TOWSONTOWNE - CANTON CROSSING	30	25	30	20	30	30	30
012	STELLA MARIS - NORTH AVE	**	**	**	**	**	**	**
013	CANTON/FELLS POINT - WALBROOK	10	10	10	10	10	15	30
014	UMTC/PATAPSCO - ANNAPOLIS	20	20	20	20	20	35	40
015	SECURITY MALL - OVERLEA/PERRY HALL	15	15	15	15	15	15	30
016	MONDAWMIN - BROOKLYN HOMES	30	20	30	20	30	30	60
017	PATAPSCO STATION- PARKWAY CENTER	-	-	60	40	50	60	60
018	GLEN - BAAS & TALMUDICAL	-	***	-	***	-	-	-
019	STATE CENTER - GOUCHER/CARNEY	20	15/30	15/30	15/30	40	20	40
020	SECURITY SQUARE MALL - DUNDALK	20	15	22	15	24/60	30	60
021	FELLS POINT - MONDAWMIN	30	20	40	20	30	60	60
022	BAYVIEW - MONDAWMIN	25	11	20	9	35	20	30
023	RT40 & ROLLING - FOX RIDGE	30	15/30	15/30	15/30	30	30	30
024	WHISPERING WOODS - MORAVIA	26	48	60	48	65	60	60
027	PLAZA STATION - PORT COVINGTON	40	20	40	20	50	40	30
029	CHERRY HILL STATION SHUTTLE	20	20	20	20	20	20	-

LineAbbr	LineName	Early	Am Peak	Base	PM Peak	Late	Saturday Peak	Sunday Peak
030	BAYVIEW - EDMONDSON VILLAGE	-	15	22	15	-	-	-
033	ROGERS STATION - MORAVIA	25	10	20	15	36	30	60
035	WHITEMARSH P&R - UMBC / BLIND IND.	23	15	20	15	27	30	30
036	NORTHERN PKWY & YORK - RIVERVIEW	20	12	15	13	31/60	30	30
038	NORTH BEND-COLD SPRING & GRANDVIEW	-	10	-	6	-	-	-
03X	CROMWELL BRIDGE - INNER HARBOR EXP	-	15	-	15	-	-	-
040	SECURITY SQ. / MIDDLE RIVER.	12	12	15	12	17	15	15
044	ROSEDALE IND PK - SECURITY SQ. MALL	30	15	20	15	30	20	45
46	CEDONIA-PARADISE QUICKBUS	-	15	-	15	-	-	-
047	WALBROOK-OVERLEA QUICKBUS	-	15	-	15	-	-	-
048	TOWSON - TRANSIT CTR	15	15	15	15	15	15	-
050	BELAIR EDISON SHUTTLE	-	20	40	20	-	40	40
051	ROGERS STATION- PATAPSCO STATION	-	15	20	15	-	35	36
052	MILFORD MILL RD- MONDAWMIN STAT	30	8	15	8	30	15	20
053	OLD COURT METRO- MONDAWMIN METRO	20	17	24	13	25/60	20	24
054	RANDALLSTOWN - NORTH & PENN	17	12	15	11	21/40	15	15
055	FOX RIDGE - TOWSON	30	20	30	20	60	30	60
056	GLYNDON - OWINGS MILLS MALL	30	25	35	20	30/60	35	35
057	SECURITY SQ. MALL/ SSA - ROGERS STA.	30	30	30	30	30	55	60
058	RP STATION - WHITE MARSH							
059	OWINGS MILLS MALL - RP STATION	40	-	40	-	40	35	35
05X	CEDONIA - EUTAW & SARATOGA EXPRESS	-	20	-	20	-	-	-
060	RP STATION - MT. WASH/GREENSPRING	60	40	60	40	60	-	-
061	BELLEMORE - CHARLES AND PRATT	45	30	-	30	45	-	-
064	NORTH AVE - CURTIS BAY / ENERGY PKY	-	15	-	15	-	40	50
077	OLD COURT STA - PATAPSCO STA	14	29	30	30	30/60	30	60

LineAbbr	LineName	Early	Am Peak	Base	PM Peak	Late	Saturday Peak	Sunday Peak
091	SINAI HOSPITAL - DOWNTOWN	20	15	20	15	20	23	45
097	MONDAWMIN SHUTTLE	30	30	30	30	30	30	30
098	HAMPDEN SHUTTLE	40	40	40	40	40	40	40
099	OLD COURT - BWI AIRPORT	-	30	-	30	-	-	-
104	CROMWELL BRIDGE - JOHNS HOPKINS	-	-	-	-	-		
10X	ROLLING ROAD - DOWNTOWN EXPRESS	-	35	-	25	-	-	-
120	WHITE MARSH - MONUMENT & RUTLAND	-	10	-	10	-	-	-
150	COLUMBIA-SARATOGA EXT.	-	30	-	30	-	-	-
15X	PERRY HALL - PACA STREET EXPRESS	-	45	-	20	-	-	-
160	WHISPERING WOOD/ ESSEX- HOPKINS HOSP	-	20	-	20	-	-	-
19X	STATE CTR. - CARNEY/ GOUCHER BLV EXP	-	10	-	10	-	-	-
64X	NORTH AVE RIVIERA BEACH EXPRESS	-	-	-	*	-	-	-

Early -- Open > 6AM AM

Peak -- 6AM <> 9AM

MID DAY -- 9AM <> 3PM

PM PEAK -- 3PM <> 6PM

LATE -- 6PM < Close

* 1 trip

** Runs every 4+ hours

"-" No services

Headways for Metro and Light Rail

Early Open > 6AM
AM Peak 6AM > 9AM
Mid Day 9AM <> 3PM
PM Peak 3PM <> 6PM
LATE 6PM < Close

Early	Am Peak	Base	PM Peak	Late	Saturday Peak	Sunday Peak
Metro	15	8	10	8	11	15
Light Rail	20/30	10	15	10/20	15/30	15/30

Headways for Commuter Bus

AM Peak Open > 9AM
Mid Day 9AM <> 2:30PM
PM Peak 2:30 PM < Close
 * Friday Only **No service on Saturday and Sunday

Line	Line Name	Am Peak	Mid Day	PM Peak	Late	Saturday Peak	Sunday Peak
201	Gaithersburg to BWI Marshall Airport	60	60	60	**	**	**
202	Metropolitan Grove to DOD/Ft. Meade	60	1 trip	60	**	**	**
203	Columbia to Bethesda	30	1 trip	30	**	**	**
204	Frederick to College Park	30	0	30	**	**	**
205	College Park to Germantown	30	0	30	**	**	**
310	Columbia to Baltimore	40	0	20	**	**	**
320	Jessup/Columbia to Baltimore	40	0	40	**	**	**
410	Churchville/Bel Air to Downtown Baltimore	30	0	30	**	**	**
411	Hickory/Bel Air to Downtown Baltimore/ Johns Hopkins Hospital	30	0	30	**	**	**
420	Havre de Grace to Downtown Baltimore	30	1 trip	30	**	**	**
901	La Plata/Waldorf to Washington, DC	10	1 trip	10	**	**	**
902	St. Leonard/ Prince Frederick to Washington, DC	9	1 trip	12	**	**	**

Line	Line Name	Am Peak	Mid Day	PM Peak	Late	Saturday Peak	Sunday Peak
903	Charlotte Hall/ Waldorf to Washington, DC	15	0	20	**	**	**
904	North Beach/Pindell to Washington, DC	13	1 trip	15	**	**	**
905	California/Charlotte Hall/Waldorf to Washington, DC	12	120	10	**	**	**
906	Waldorf and Accokeek to Washington, DC	30	0	30	**	**	**
907	La Plata/Waldorf to Washington, DC	15	0	15	**	**	**
909	California/Charlotte Hall to Washington, DC	30	0	30	**	**	**
915	Columbia/Silver Spring/ Washington, DC	16	0	12	**	**	**
922	Kent Island/Annapolis/ Washington, DC	15	0	15	**	**	**
929	Columbia/Silver Spring/ Washington, DC	30-45	1 trip	20-60	**	**	**
950	Kent Island/Annapolis/ Washington, DC	20	1 trip	25	**	**	**
991	Hagerstown/Frederick to Shady Grove/Rock Spring Business Par	15-20	1 trip	5-15	**	**	**
995	Clarksville/Ellicott City/Columbia/ Washington,DC	12	0	10-15	**	**	**

Headways for MARC

AM Peak Open > 9AM

Mid Day 9AM <> 2:30 PM

PM Peak 2:30 PM < Close

* Friday Only **No service on Saturday and Sunday

Line Name	Am Peak	Mid Day	PM Peak	Late	Saturday Peak	Sunday Peak
Brunswick	22	1 trip *	30	**	**	**
Camden	30	0	35	**	**	**
Penn	25	60	20			

On Time Performance (OTP)

It is MTA's goal to have 85% of its service meeting its on-time performance standards. On-time performance is tracked and monitored by each division

- **Local bus** considers a vehicle on time if it reaches various destinations along the route within five minute of its schedule time. This data is collected and record by the AVL system.
- **Metro Subway and Light Rail** both considers a vehicle on time if it reaches the terminus within five minutes of its scheduled time.
- **MARC** considers its service on time if the train reaches its terminus within six minutes of its published time.
- **Commuter bus** considers a vehicle on time if it reaches its destination within six minutes of its published time.

Local Bus OTP by Month

Route	Sep-13	Oct-13	Nov-13	Dec-13	Jan-13
1	90.82	91.14	92.71	91.56	91.68
3	81.68	84.71	87.13	85.51	84.99
4	73.47	74.45	80.16	76.95	75.89
5	82.62	86.41	88.04	84.78	84.56
7	79.54	83.92	85.36	85.25	82.23
8	73.33	81.1	82.94	79.92	81.23
9	71.46	76.19	82.81	76.47	77.51
10	81.48	83.32	84.47	81.9	81.46
11	81.24	79.39	84.46	81.59	84.31
12	87.56	81.62	88.72	89.32	82.02
13	78.38	82.95	84.79	81.01	81.79
14	78.4	78.54	83.48	80.44	80.02
15	79.6	82.69	83.94	83.51	83.3
16	78.69	80.22	83.37	81.03	78.38
17	81.31	78.61	85.43	83.03	80.85
18	81.71	85.37	85.46	83.45	80.04
19	77.74	81.17	84.48	82.23	82.52
20	75.05	78.9	80.47	79.57	78.81
21	80.95	81.51	82.12	81.64	80.41
22	80.71	82.42	85.4	82.43	83.67
23	77.18	78.34	81.96	78.38	77.17
24	76	73.14	80.39	80.27	76
27	78.67	81.7	79.59	76.53	78.85
29	81.67	78.52	81.9	79.9	78.66
30	76.15	75.34	81.73	78.34	79.99
33	74.73	79.15	81.64	79.85	79.85
35	77.21	77.96	80.94	78.18	79.29
36	79.12	81.76	84.54	82.22	81.37
38	83.02	80	82.88	93.68	80.25
40	74.01	76.58	81.55	77.75	77.4

Local Bus OTP by Month *Continued*

Route	Sep-13	Oct-13	Nov-13	Dec-13	Jan-13
44	79.78	80.14	82.73	80.39	80.51
46	71.04	77.86	81.59	79.24	75.59
47	77.92	78.01	81.77	81.69	80.77
48	75.78	77.69	80.36	78.3	80.64
50	85.7	87.39	90.07	86.1	91.6
51	80.1	81.9	84.39	81.25	81.59
52	82.31	83.8	85.74	82.14	82.07
53	81.33	83.93	82.59	82.74	82.07
54	81.64	80.71	84.36	79.91	79.89
55	75.85	80.2	84.47	81.55	83.49
56	86.05	86.46	86.38	84.89	87.08
57	84.39	84.25	86.82	82.97	82.36
58	82.26	84.36	85.73	80.84	80.96
59	84.29	84.33	83.75	82.4	80.55
60	85.94	88.62	86.35	83.62	86.55
61	82.38	83.77	87.34	85.6	82.35
64	82.86	84.21	84.88	83.65	82.79
77	75.82	78.38	80.16	77.55	78.76
91	79.79	83.77	84.37	84.97	83.42
97	82.39	80.74	83.11	80.67	82.32
98	78.76	79.85	87.07	79.69	80.9
99	93.71	91.88	86.42	75.48	81.94
104	71.19	72	82.69	68.24	58.7
120	78.4	76.57	80.25	77.89	79.09
150	75.34	77.09	86.96	82.28	82.81
160	76.15	77.19	77.02	72.48	81.95
SYSTEM TOTAL	80%	81%	84%	81%	81%

On Time Performance (OTP) by Month

Metro					App. V-B
	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13
System Wide	97%	96%	99%	98%	98%

Light Rail					App. V-C
	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13
System Wide	97.89%	98.5%	98.03%	97.71%	97.66%

Commuter Bus					App. V-D
	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13
System wide	96.96%	95.62%	88.89%	93.57%	93.99%

Marc Train OTP By Month					App. V-E
	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13
Penn Line	91%	91%	91%	96%	92%
Brunswick Line	92%	93%	96%	98%	94%
Camden Line	93%	98%	99%	98%	94%
System Total	91%	93%	94%	97%	92%

Service Availability

MTA provides service within Baltimore, Anne Arundel, District of Columbia, Prince George, Charles, Calvert, Queen Anne, Harford, Loudoun, Montgomery, Jefferson, Berkeley, Washington, Frederick, Cecil Counties and Baltimore City.

Table 5 shows the percentages of minority and non-minority households served within MTA service Area.

*The total service area is the aggregate of all the modal service areas.

**The percentages of minority households within ¼ mile walk of stops and/or stations.

Other modes' percentages use ½ mile up to 10 miles base on Four Square's MTA Title VI Policy Analysis Methodology.

Service Area						
Table 5	Total Population	Minority	ACS Pop. Est.	Pop. Below Poverty	Percent Minority	Percent Below Poverty
Total Service Area*	5,629,865	2,739,792	5,467,904	517,148	48.7%	9.5%
Local Bus Service Area**	1,533,490	793,367	1,481,333	207,998	51.7%	14.0%
Commuter Bus Service	3,527,243	1,730,218	3,436,006	273,915	49.1%	8.0%
Express Bus Service	899,988	386,840	859,706	112,138	43.0%	13.0%
LRT Service Area	1,815,589	876,727	1,754,825	216,121	48.3%	12.3%
MARC Service Area	4,252,360	2,234,654	4,131,579	436,301	52.6%	10.6%
Metro Service Area	901,887	586,473	867,868	149,749	65.0%	17.3%

Service Policies

Service Policy

Transit Amenity – (SEE MEMORANDUM): Bus Stop Shelter Placement and Evaluation



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
James T. Smith, Jr., Secretary • Robert L. Smith, Administrator

TO: Ricky DeGraffenreid, Deputy Chief Operating Officer
FROM: Michael Walk, Acting Director of Service Development
DATE: December 10, 2013
SUBJECT: Memorandum regarding bus stop shelter placement and evaluation

The Maryland Transit Administration (MTA) has historically placed and maintained bus passenger shelters throughout its service area. In 2002, the MTA contracted with Viacom Advertising, later to become CBS Outdoor Advertising, for the placement and maintenance of bus passenger shelters. Contracting out placement and maintenance allowed the MTA to bring in revenue from shelter-based advertising, while transferring the cost of shelter placement and maintenance away from the MTA. This contract ended February 28, 2013. MTA is currently finalizing a new procurement to handle replacement of old shelters as well as introducing new shelters.

To guide the placement of new shelters, the MTA identified candidate shelter sites based on passenger boarding and transfer activity. Special consideration was given to sensitive uses, such as community centers, colleges and universities, medical facilities or clinics, and senior centers, to place shelters nearby when possible.

As the potential shelter vendor also requires advertising revenue in order to make the contract profitable, the vendor gives additional weight to placements in areas of high traffic volume in order to maximize the marketability of the advertising.

As with any bus stop placement, stops with shelters must provide safe passenger waiting conditions, provide best possible access for the bus, and cannot be placed in conflict with underground utilities. The MTA faces additional constraints in placing shelters.

- **ADA considerations.** Shelters cannot obstruct a sidewalk and adequate space must be left before or behind a shelter to allow passage and safe use of the sidewalk.
- **Right of way.** Shelters are placed in the public right of way (ROW), and cannot be placed where ROW is too narrow to allow for safe and accessible placement. In rare cases, the MTA has placed shelters on private property. This usually has been at the request of the property owner and requires an easement to use the private property.
- **Access to electricity.** Ad shelters must be placed within 50 feet of an existing electrical source, to power lighting behind the ads.

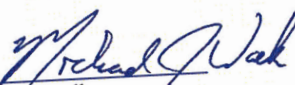
1515 Washington Boulevard • Baltimore, Maryland 21230-1794 • TTY 410-539-3497 • Toll Free 1-866-743-3682

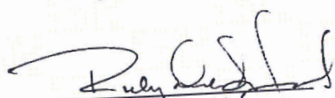
- **Consent of adjacent property owners and local jurisdictions.** As part of MTA's good neighbor policy, the MTA seeks concurrence from adjacent property owners prior to placing a shelter. **This cuts down on costs of shelter removal after the fact and greatly improves MTA's relationship with constituents.** This also means that a property owner can essentially veto the placement of a shelter.

Based on these constraints, the MTA currently owns and maintains 424 documented shelters located at 394 transit stops. Some transit stops have multiple shelters such as Mondawmin Station which has a shelter at each bus bay for a total of 10 shelters. The total number of documented shelters include shelters that were originally owned and maintained by MTA (171) as well as shelters that were owned and maintained under the CBS Outdoor Advertising contract (253), which ended February 28, 2013. The CBS shelters are now under MTA ownership and maintenance until another shelter contract is awarded.

Assessment of the locations of MTA's shelters indicates that they are equitably placed. The average shelter is in a census tract where 59.5% of the population is minority and 20.6% of the population is below the poverty line¹. This should be compared to MTA's service area average of 48.7% minority and 9.6% below the poverty line.

MTA's Office of Service Development will continue to monitor and assess the equitable distribution of shelters.

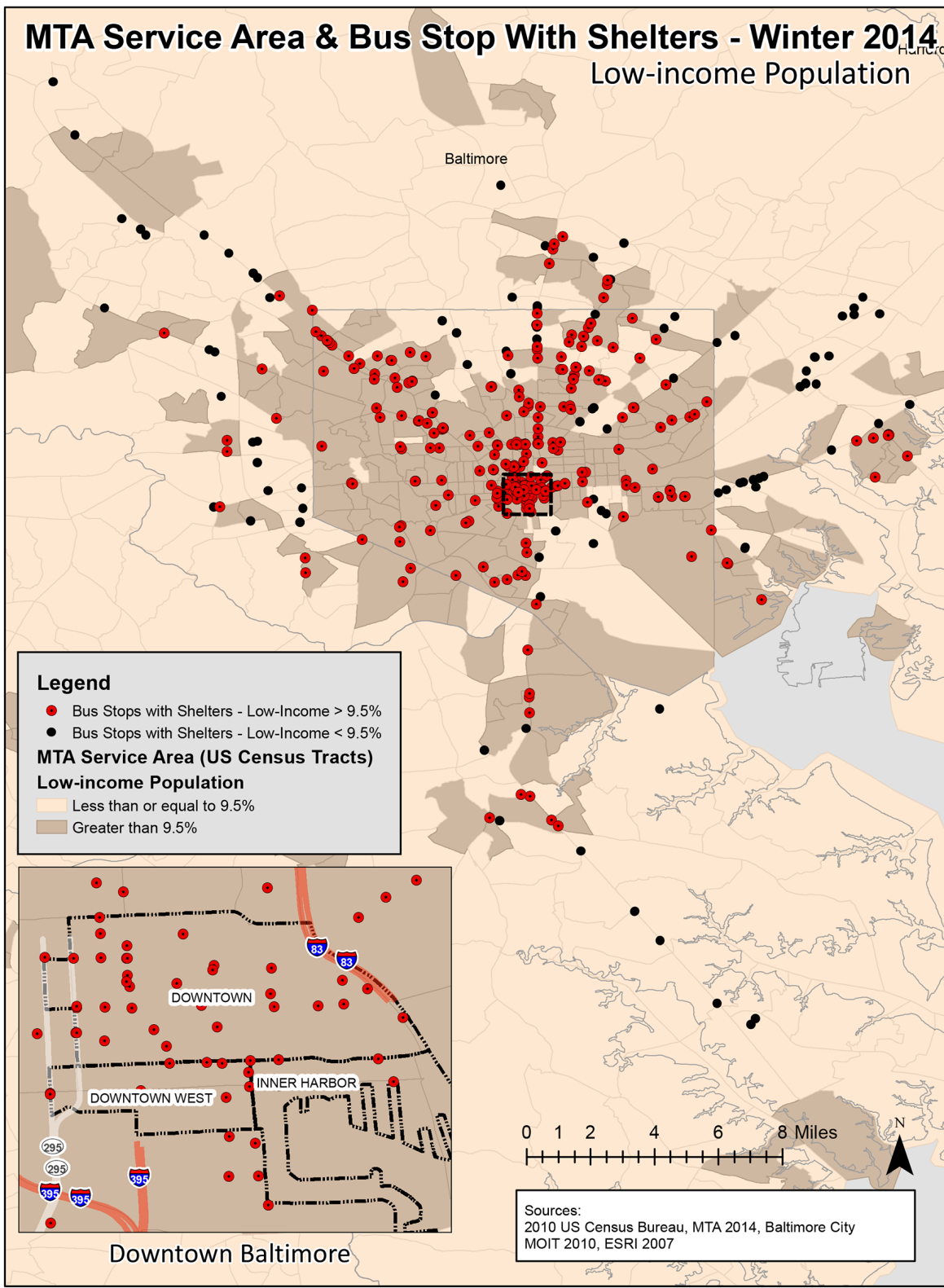

Michael J. Walk
Acting Director of Service Development


Ricky DeGraffenreid
Deputy Chief Operating Officer

¹ This calculation is based on the weighted average minority and poverty proportions for each stop with shelters based on the census tract proportions in which each shelter is placed.

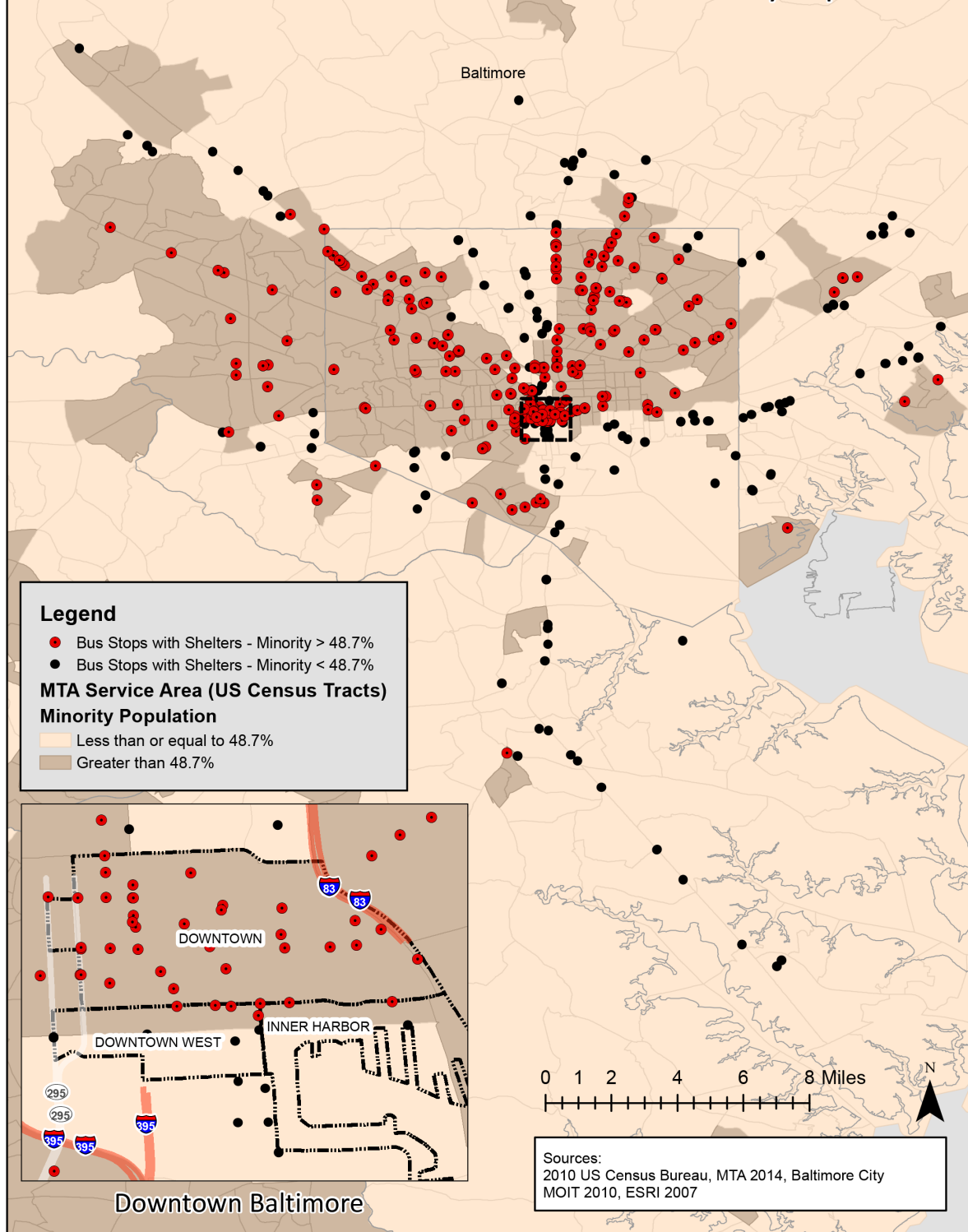
MTA Service Area & Bus Stop With Shelters - Winter 2014

Low-income Population



MTA Service Area & Bus Stop With Shelters - Winter 2014

Minority Population



the tree.

MTA's Policies for vehicle assignment are based on the average age of the vehicles at divisions. We may assign vehicles to division so that the age of the vehicles at each division does not exceed our system wide average. Assignment may be based on the type of vehicle. We may assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, certain types of vehicles could be assigned for express or commuter service. MTA's fleet includes vehicles equipped with technology designed to reduce emissions. The policy will address how these vehicles will be assigned throughout the service area.

During recent years, MTA has utilized its Trapeze scheduling software to increase the efficiency of the Core Bus Service. This has resulted in an increased amount of interlining where buses are used on multiple routes. Although this increases the overall service efficiency, the assignment of buses to individual routes is no longer possible for the purpose of establishing the Peak Vehicle Requirement.

MTA prepared and adopted, as policy the 'Local Bus Service Standards.' These standards include criteria for Route Design, Vehicle Loads, Service Span and Frequency, Bus Stop Placement, and Route Performance. Some of the standards were revised in 2012. The standards on Route Performance include metrics on Passenger Boardings per Total Hour and Mile, and Passenger Miles per Seat Mile (load factor). A typical report, generated after each schedule change, includes the following information:

Route, Route Classification, Weekday Boardings, Weekday Total Hours, Boardings per Total Hour, Boardings per Total Mile, Route Cost, Performance Ratio, Passenger Miles/ Seat Miles – Load Factor, Average Daily Passenger Miles, Cost per Passenger Mile, Category Ranking, and Overall Ranking.

MTA will do an assessment and it will focus on whether the newest buses in the bus fleet at each garage are being assigned on an equitable basis to all populations and communities identified for inclusion under Title VI. The evaluation measure to be used for this assessment is whether minority or low-income dominant routes are assigned buses in the same manner as they are being assigned to non-minority or non-low-income routes.

The steps for completing this analysis are outlined as follows:

1. MTA will identify Minority and Low-Income Dominant Routes – This process is already part of the load standard assessment
2. MTA will track Bus assignments by age – This is tracking of bus assignments by route, MTA records this information on a daily basis. The age of each bus will be included
3. MTA will produce a quarterly summary report using the daily bus assignment data
4. Final Summary will contain the average age of the buses assigned for each route in the system. This will allow a comparison of the average age of buses assigned to each route across the entire system.

If MTA assigns in a random manner, the average age over the three month period between routes should not be significantly different from each other. If there are significant discrepancies in the average ages of the buses assigned to minority dominant and low income dominant routes relative to non-minority and non-low income routes, a mitigation plan will be required.

In addition to the specific performance standards such as on-time performance, the MTA has a proactive approach to addressing customer complaints. Each customer complaint, received through the call center, letters, e-mails, or from the MTA website, is logged into a database. Each complaint is assigned to the appropriate office for investigation, which then reports back to the Customer Service Department. Based on the results of the investigation a Customer Service Officer responds to the complaint, by mail, e-mail, or phone.

In addition, customer complaint trends are tracked and are on the agenda of monthly meetings, where senior management, supported by technical staff, identifies strategies to address these issues.

Maryland Transit Administration (MTA) Title VI Equity Analysis Policies and Procedures

August 5, 2014

BACKGROUND

As part of its overall program to comply with Title VI, the Maryland Transit Administration (MTA) conducts a service and fare equity analysis whenever the agency proposes a “major” service change or any magnitude of fare change. Equity analyses are conducted regardless of whether proposed changes would be detrimental or beneficial to riders on the whole: service expansions or fare decreases are evaluated according to a similar process as a service reduction or fare increase. Per FTA regulations (FTA C.4702.1B), the definitions/thresholds outlined below are applied uniformly, regardless of mode, and will not be altered until the next Title VI Program submission.

This document presents the methodology/written procedures for conducting equity analyses at MTA, including:

- **Major Service Change** - Definition of the thresholds for when a service change would be considered as “major” and when the effect of the change could have a significant adverse effect on minority or low-income populations (thus requiring an equity analysis).
- **Definition of Disparate Impact/Disproportionate Burden (DI/DB)** - Definitions of the thresholds for when the impact on minority/low-income populations is disparate or disproportionate when compared to the minority/low-income population in the service areas (disparate impact and disproportionate burden).
- **Public and Administrator Engagement** - Description of the process by which the public and MTA Administrator were engaged as these thresholds and procedures were established (including MTA Administrator approval of final results).
- **Data Available** - The source/ availability of data needed for the analyses including data on fixed route services, fare media usage, service area population characteristics, and rider characteristics.
- **Procedures for Conducting Service and Fare Equity Analyses** - Including a step by step methodology and data used for service and fare equity analyses.
- **Procedures for Mitigating DI/DB** - In cases where the MTA finds potential disparate or disproportionate impacts, it may be possible to modify the proposed changes or take measures to mitigate the impacts on minorities/low-income populations. If there are no modifications that would have a less disparate impact on minority/low-income riders, MTA will consider and analyze alternatives and provide a meaningful opportunity for public comment on any mitigation measures or alternatives.

MTA SERVICES AND MARKET

MTA is a statewide agency that provides multi-modal transit services in two very large urbanized areas (Baltimore and Washington). The agency provides commuter rail and commuter bus into the Baltimore and Washington regions and light rail, subway, and local bus within the Baltimore area.

Because of the complex system of services operated by MTA and the large geographical area served, the agency will conduct service and fare equity analyses by geographical areal market:

Local Services

- Core (local) Bus
- Light Rail
- Subway

Commuter Services

- Commuter Rail
- Commuter Bus

The two markets are distinct in terms of who they serve (rider characteristics vary greatly) and where they serve; demographics and rider characteristics vary in the commuter markets versus the local Baltimore areas. Further, the fare media and fare levels are distinctly different among the modes.

While the definition of “major service change” varies slightly across modes, the DI/DB thresholds will be the same for each mode. However, the thresholds will be applied independently for each market when conducting equity analyses. In other words, the percentage minorities affected by a change in a particular market would be compared to the overall percentage of minorities in that market, not to the Maryland minority average for the entire statewide service area.

DEFINITION OF A MAJOR SERVICE CHANGE

MTA routinely conducts a Title VI analysis when fare or major service changes are proposed. Any change (increase or decrease) in the MTA fare structure requires an analysis.

By Maryland State law (COMAR Transportation Article §7-506), MTA is required to conduct public hearings prior to the implementation of any of the following service changes:

- (a) Establish or abandon any bus or rail route listed on a published timetable;
- (b) Change bus or rail route alignment listed on a published timetable, unless the change is needed because of temporary construction or changes in the road network;
- (c) Reduce the frequency, number of days, or days of service for a commuter bus or commuter rail route without substituting a comparable level of service, unless the reduction is temporary or a result of:
 - a. A natural disaster;
 - b. Weather or other emergency conditions;
 - c. Schedule adjustments required by third party that operates service on the same right-of-way; or
 - d. Other circumstance beyond the control of the Administration; or
- (d) Establish or abandon a rail transit station.

COMAR does contain one exception: “The Administration may add service on a new alignment branching off of an existing route without holding a public hearing, if the addition of the new alignment does not alter the existing route.”

Because existing statutes already regulate in what circumstances MTA must conduct public hearings prior to service or fare change implementation, the Title VI major service change definition was established to incorporate these existing elements, but to also include other elements that are in the spirit of the protections afforded under Title VI.

For service changes, Title VI equity analyses are only required for “major service changes.” MTA’s major service change definition under Title VI includes modifications to:

- 1) Service Availability (span and/ or service days)
- 2) Service Quantity (frequency and/or revenue miles or hours)
- 3) Geographic Alignments

Service Availability (Span & Service Days)

Mode	Major Availability Modification
Core Bus	<ol style="list-style-type: none"> 1) Altering a line's span of service¹ by an hour or more on a given service day (unless an alternative line provides equivalent transit opportunity) 2) Ceasing or implementing a line's operation on a given service day.
Light Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - increase or decrease span on entire line 2) Same as Core Bus - ceasing or implementing a line's operation on a given service day 3) Altering span of service at a given train station on a given service day by an hour or more
Metro Subway	<ol style="list-style-type: none"> 1) Same as Core Bus - increase or decrease span on entire line 2) Same as Core Bus - ceasing or implementing a line's operation on a given service day 3) Same as Light Rail- altering span of service at a given train station on a given service day by an hour or more
Commuter Bus	<ol style="list-style-type: none"> 1) Same as Core Bus - increase or decrease span on entire line 2) Same as Core Bus - ceasing or implementing a line's operation on a given service day
MARC Commuter Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - increase or decrease span on entire line 2) Same as Core Bus - ceasing or implementing a line's operation on a given service day 3) Changing the number of daily stops at a MARC station by more than 25

¹Definitions:

Span of Service: the times in a given service day that represent a line's start of service and end of service. For purposes of Title VI, span is measured from a. the departure time of the first trip from the line terminus that travels the entire length of the line's modal pattern to b. the departure time of the last trip from the line terminus that travels the entire length of the line's modal pattern.

Modal Pattern: refers to the pattern(s) of a line that is traveled the most number of times in a given service day. For lines with branches, the pattern to either branch is acceptable as the modal pattern, assuming both branches get about equivalent service.

Service Quantity (Frequency & Revenue Miles/Hours)

Mode	Major Quantity Modification
Core Bus	<ol style="list-style-type: none"> 1) Modifying a line's total revenue miles or hours by 20% or more on a given service day. 2) Modifying a line segment's total revenue miles or hours by 50% or more on a given service day.
Light Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - modifying a line's total revenue miles or hours by 20% or more on a given service day 2) Same as Core Bus - modifying a line segment's total revenue miles or hours by 50% or more on a given service day
Metro Subway	<ol style="list-style-type: none"> 1) Same as Core Bus - modifying a line's total revenue miles or hours by 20% or more on a given service day 2) Same as Core Bus - modifying a line segment's total revenue miles or hours by 50% or more on a given service day
Commuter Bus	<ol style="list-style-type: none"> 1) Same as Core Bus - modifying a line's total revenue miles or hours by 20% or more on a given service day 2) Same as Core Bus - modifying a line segment's total revenue miles or hours by 50% or more on a given service day
MARC Commuter Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - modifying a line's total revenue miles or hours by 20% or more on a given service day

Geographic Alignments

Mode	Major Geographic Modification
Core Bus	<ol style="list-style-type: none"> 1) Establishing or abandoning a line in its entirety. 2) Altering the permanent geographic alignment of a line or part of a line. This also includes extending or cutting back lines. 3) Abandoning bus stops along a portion of a transit line that would force a 1-mile or more increase in walking to access the same transit line.
Light Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - establishing or abandoning a line in its entirety 2) Establishing or abandoning a rail station, except for minor moves of rail stations that do not significantly affect access (a move of 1/4-mile or less).
Metro Subway	<ol style="list-style-type: none"> 1) Same as Core Bus - establishing or abandoning a line in its entirety 2) Same as Light Rail - establishing or abandoning a rail station
Commuter Bus	<ol style="list-style-type: none"> 1) Same as Core Bus - establishing or abandoning a line in its entirety
MARC Commuter Rail	<ol style="list-style-type: none"> 1) Same as Core Bus - establishing or abandoning a line in its entirety 2) Same as Light Rail - establishing or abandoning a rail station

In addition, the following service changes are exempt from the Major Service Change Policy:

- Seasonal service changes
- Creation, modification, or discontinuation of a demonstration route² within the first 12 months of operation (however, COMAR requirements will still apply).
- Diversions, frequency changes, or span modifications due to local events, construction, weather, and emergencies.

² Demonstration Route is a new route implemented specifically on a trial basis for purposes of study and evaluation of new alignment, line, service model, or segment.

DISPARATE IMPACT AND DISPROPORTIONATE BURDEN DEFINITIONS

Adverse Effects

As indicated in the section on “major service changes,” MTA has determined that discontinuation of service, significant reductions in frequency, and/ or significant reductions in the span of service could have adverse effects on minorities and low-income populations. Thus, MTA would conduct service equity analyses for all service changes meeting their “major service change” definitions. For fare changes, any increase in price could have an adverse effect.

Service Change - Disparate Impact and Disproportionate Burden Thresholds

Disparate Impact Threshold

Disparate impact (DI) refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin.

For service reductions, a DI occurs if the absolute difference between 1) the percentage of minority population affected by a service reduction in one of the markets and 2) the percentage of minority population in that market is 15 percentage points or greater. Similarly, for service improvements, a DI occurs if the percentage of minorities benefitting from the change is 15 percentage points lower than the percentage of minorities in the market.

Disproportionate Burden Threshold

Disproportionate burden (DB) refers to a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

For service reductions, a DB occurs if the absolute difference between 1) the percentage of the low-income population affected by the change and 2) the percentage of low-income population using the mode is 10 percentage points or greater. For service improvements, a DB occurs if the percentage of low-income population benefitting from the change is 10 percentage points lower than the percentage of low-income population using the service.

Fare Changes - Disparate Impact and Disproportionate Burden Thresholds

Fare changes are analyzed for DI/DB using a two-step process as follows:

Step 1 - Identify fare media used disproportionately by minorities/low-income - MTA is using survey data to identify fare media that are used disproportionately by minority or low-income riders. When the absolute difference between the share of minority or low-income riders using a particular fare media exceeds the share of all riders using that fare media by 10 percentage points, that fare media is judged to be used “disproportionately” by minorities or low-income individuals. These fare media are analyzed in depth when a fare change is proposed. Note that in cases where fare media are used by less than 1 of riders, MTA deems any changes to these media as minimal; these fare media are not considered for further analysis.

Step 2 - Examine fare increase or decrease for DI/DB on fare media used disproportionately by minorities and low-income - When MTA has a fare increase or decrease, it analyzes the fare media that are used disproportionately by minorities or low-income for DI/DB. If the percentage

price increase/ decrease for those fare media is 10 percentage points different than the unweighted average percentage price increase/ decrease for all ticket types, then the fare change has a disparate impact or disproportionate burden.

MTA DATA SOURCES

MTA uses census data for service equity analyses and rider survey data to analyze fare increases/ reductions.

Service Equity Analyses - Census Data

MTA uses demographic data from the 2010 Census and American Community Survey (ACS) to perform service equity analyses. MTA completes demographic analyses and mapping using GIS. The minority and low-income population data are used at the Census block group level (or tracts) from the most recent ACS (currently 2008-2012).

MTA uses GIS to map each route including all stop/station locations and creates buffers around each stop/station. The size of the buffer varies by the type of stop:

- Local Bus Services: one-quarter mile buffer,
- Express Bus: 5 mile buffer around park and ride lots,
- Light Rail, Subway and Commuter Bus and Commuter Rail without park and ride lots: half mile buffer around stations, and
- Light Rail, Subway and Commuter Bus and Commuter Rail with park and ride lots: buffer varied around stations based on license plate survey (varied from 0.5 to 10 miles).

These buffers represent the service area in which passengers can access the stops. All of the buffers are merged into a combined service area buffer and demographics for any block groups (or tracts) at least partially contained within the buffers are captured.

The demographic characteristics of each bus route, rail line, and rail station have been compiled - creating a snapshot of the minority and income characteristics of riders in both the local and commuter markets. This data also is used to estimate the percentage of riders on a particular route, line, or station that is minority or low-income, and the percentage may be affected by a service change to the route or line.

For analyses that might affect potential riders in an area (such as a service expansion), MTA relies on ACS data to provide overall population, minority, and low-income (census definition) information.

Fare Equity Analysis - Rider Survey Data

MTA uses rider survey data for fare equity analyses. The agency routinely conducts passenger surveys that include:

- Race/ ethnicity
- Income (low-income defined as a household income below \$20,000)
- Use of Fare Media

Most recent surveys by mode are the 2012 rider surveys for local bus, subway, light rail, and commuter bus.

MTA utilizes these data from on-going rider surveys to identify the number of riders using individual fare media, including the number of minority and low-income riders using each fare media type. The

only income data available from these surveys was whether customers' household incomes exceed \$20,000, so the low-income designation used in the equity analyses was a household income of \$20,000 or less.

PROCEDURES FOR CONDUCTING EQUITY ANALYSIS - STEP BY STEP METHODOLOGY

Service Equity Analysis

With census demographic data compiled at the route/line and station level, MTA is able to determine the number and percentage of minority and low-income trips on each route/line and the two markets as a whole. Where routes/lines are proposed to be changed, MTA considers the trips on those routes/lines to be "impacted." The impacted trips on these routes are separated by trips adversely impacted and trips benefiting from the service proposal. MTA then compares the total percentages of minority and low-income trips, of trips adversely impacted and benefiting separately, to the market's average percentages of minority and low-income living in the market service area. The difference in percentages is compared to the corresponding disparate impact and disproportionate burden thresholds to determine compliance.

If potential disparate impacts on minority riders are found, MTA will analyze alternatives to determine if any exist that would serve legitimate program goals, but with less of a disparate effect based on race, color, or national origin. If potential disproportionate burdens on low-income riders are found, MTA will take steps to avoid, minimize, or mitigate impacts where practicable, including describing available alternatives.

Step by step procedures for Service Equity analyses are as follows:

1. Group service changes by type including, but not limited to, span of service, frequency of service, and service discontinuation.
2. Determine the market area's percentages of minority population and low-income population.
3. Identify the overall, minority, and low-income riders impacted by each major service change or a "package" of changes.
4. Display the absolute numbers of the impacted overall population and the impacted minority or low-income population per service change in separate tables for minority and low-income data. Identify the percent share that the impacted minority or low-income population is of the impacted overall population. Include at the bottom of the tables the net total impacted populations by subtracting the populations impacted by the adverse service changes from the populations impacted by the positive service changes.
5. Next, summarize the impacted population data by type of service change. Create one table each for minority and low-income data that outlines the impacted populations per type of service change, grouping the adverse service changes together and the positive service changes together. Determine the overall impacted populations for the adverse service changes together, as well as the positive service changes together.
6. Compare the shares of minority or low-income persons adversely impacted to the minority or low-income populations in the market. MTA calculates the absolute difference and applies its policy thresholds to determine if a disparate impact or disproportionate burden occurs.

Repeat this step for the shares of minority or low-income persons positively impacted by the service changes.

Where the absolute difference between the percentage of affected minority population and the percentage of the market's minority population is at least 15%, MTA considers the service change to have a disparate impact.

Where the absolute difference between the percentage of affected low-income population and the percentage of the market's low-income population is at least 10%, MTA considers the service change to have a disproportionate burden.

Fare Equity Analysis

MTA completes an equity analysis for all fare changes. The agency's approach to determining disparate impacts or disproportionate burdens is a two-step process.

First, MTA determines if any method of payment is disproportionately used by minority or low-income riders (by applying the threshold of 10% absolute difference to all fare media used by 14% or more of riders). Second, for any payment methods that are disproportionately utilized by minority or low-income riders, MTA determines whether disparate impacts or disproportionate burdens occur by examining the percentage change in cost for those payment methods in comparison to the average of all fare changes (by applying the threshold of at least 10 absolute difference).

Step by step procedures for Fare Equity analyses are as follows:

1. Construct a table that shows, for each fare media, the fare before and after the change, as well as the absolute and percentage changes in price. Include all fare media, even those that are not proposed to change. MTA determines the available fare media and use of each fare media by market based on data from rider surveys.
2. In a second table, for each fare media determine the minority and low-income shares of riders using that fare media, as well as the share of overall riders using that payment method (all as percentages). Also determine the minority, low-income, and overall shares of riders for fare media (total at bottom of table). Disregard fare media used by less than 1% of riders. MTA utilizes minority and low-income data, differentiated by fare media from rider surveys.
3. Next, for each fare media, calculate the absolute differences between the percentages of minority usage and overall usage and between the percentages of low-income usage and overall usage. Add all this information to the second table.

Note that MTA identifies fare media that were *disproportionately used by minority or low-income riders* where the absolute differences were at least 10 percentage points greater for minority or low-income usage than for overall rider usage.

Where MTA determines that no methods of payment were disproportionately used by minority or low-income riders, it concludes that none of the fare changes results in a disparate impact or a disproportionate burden.

4. For fare media that are disproportionately used by minority or low-income riders, MTA compares the percentage change in cost for that fare media to the unweighted average percentage change in cost for all fare media in that market. MTA considers there to be

disparate impacts or disproportionate burdens if price changes to a *specific fare media*, used disproportionately by minority or low-income riders, are at least 10 points higher/lower than the unweighted average percentage price increase/ decrease for all fare media in that market.

ALTERNATIVES AND MITIGATION

1. If potential disparate impacts on minority riders are found, MTA will analyze alternatives to determine if any exist that would serve legitimate program goals, but with less of a disparate effect based on race, color, or national origin. If potential disproportionate burdens on low-income riders are found, MTA will take steps to avoid, minimize, or mitigate impacts where practicable, including describing available alternatives.
2. MTA will complete an equity analysis of the revised service changes to confirm that the cumulative changes no longer resulted in a disparate impact/ disproportionate burden.

PUBLIC AND ADMINISTRATOR ENGAGEMENT

MTA engaged the public in developing the definitions and policies for major service changes, disparate impact, and disproportionate burden, and the MTA Administrator has reviewed and approved these definitions and policies.

Public Outreach Approach

MTA's public outreach activities were carried out in May and June 2014. The activities were designed to be meaningful, but feasible to implement in a timely manner, especially given the large and diverse geography of MTA's service area.

MTA outreach efforts included:

1. **Consulted with Community Advisory Committees** - MTA staff presented the draft DI/DB policies to two MTA advisory committees, the Citizens Advisory Committee (CAC) and the Citizens Advisory Committee for Accessible Transportation (CACAT), and obtained their input. The CAC meeting was held April 16, 2014, and the CACAT meeting was held April 18, 2014.
2. **Conducted Community Survey** - A community survey was conducted to solicit the public's input on the proposed major service change and DI/DB policies. MTA collected 858 total responses (634 paper responses, 224 online responses) to the survey. A copy of the survey is included in Appendix A.
3. **Promotion/Distribution of the Community Survey** - In order to obtain input from a diverse cross-section of the community, the survey was promoted and accessed through MTA's website and other social media outlets. In addition, MTA staff made extra efforts to reach out to the community using pop-up/intercept techniques described below. As outlined below, the survey was advertised and distributed both electronically and in hard copy.

- a. **Web-based Distribution** - An electronic version of the survey was posted on the MTA website and/ or distributed through social media outlets. The Survey Monkey went “live” on Tuesday, May 27, 2014.
- b. **MTA Transit Store** - Hard copies were available at the MTA Transit Store beginning May 27, 2014.
- c. **Media and Social Media Targeted to Ethnic Communities** - MTA sent the survey link to media outlets, including ethnic media, and through social media. These efforts included media and social media that serve populations with limited English proficiency:
 - Mayor’s Office of Neighborhoods and Constituent Services
 - Office of the Mayor, Baltimore City Hispanic Commission
 - Governor’s Office on Community Initiatives: Ethnic and Cultural Commissions
 - Statewide listserv subscribers (dissemination was not limited to ethnic stakeholders). The Ethnic Commissions included African American, African, Asian American, Caribbean, Hispanic, Indian, Middle Eastern, and South Asian. Each commission has their own website.
 - Baltimore County 1) Dept. of Communications and 2) Multicultural Program
 - Webmasters and/or Public Relations and Communications Departments: Morgan U; CCBC (all campuses); Coppin U; Johns Hopkins U (all campuses)
 - de la Comunidad
 - Esperanza Centre
 - Immigration Outreach Service Center in Baltimore
- d. **Pop-Ups/Intercepts** - MTA staff distributed the survey at various high-traffic transit locations or transfer centers. Staff asked constituents to complete a hard copy survey, and provided links to the on-line survey during the morning rush hour at two locations - the Mondawmin Transit Center (June 19, 2014) and the Baltimore Arena Bus Stops (June 24, 2014). CharmCards were provided as incentives to participants to fill out surveys on the spot and staff assisted community members in completing the survey. Photos of the pop-up events are included in Figure 1.

Figure 1: MTA Title VI Survey Pop-Ups



APPENDIX A

Public Input Survey

MTA Survey on Proposed Title VI Policies

MTA is working to improve public involvement in our decisions about planning and improving transit service. We need to learn the best ways to communicate with you and the best ways for you to give us your opinion about proposed “major” service and fare changes. We also need to learn about what you think are significant or important changes to our service. This survey will help us to understand how you feel about these issues before any changes are considered. Your input now will help you have a voice in MTA’s future transit decisions.

Major Service Change Policy

The MTA is required by federal law to develop a written policy about major service changes and how those changes may affect minority and low-income customers more than other customers, since MTA must ensure, as much as possible, that all affected communities receive the benefits of our service equally. To do this, we first want to get your opinion on what you consider to be “a major service change.” Please answer the questions below and tell us what you think:

- A. Is it a major service change if service starts one hour later, or ends one hour earlier? Yes or No
- B. Is eliminating service on an entire bus or rail line a major service change? Yes or No
- C. Is eliminating service on a bus or rail line on a Saturday or Sunday a major service change? Yes or No
- D. Is it a major service change if the total miles or hours on a bus or rail line are changed by 20% or more (for example removing every 5th bus or train from the schedule)? Yes or No
- E. Is permanently changing the routing of a bus line (for example, extending or cutting part of the line) a major change? Yes or No
- F. Is eliminating a bus stop where the next closest stop for the same bus line is 1 mile away a major service change? Yes or No
- G. Is closing a rail station/rail stop a major service change? Yes or No
- H. Is opening a new rail station/rail stop a major service change? Yes or No

Policy on Service Changes which Impact Low-Income or Minority Riders

The MTA is also developing what are called, “Disparate Impact and Disproportionate Burden Policies.” While service and fare changes are meant to impact all riders equally, sometimes there could be a difference in impacts on minority (disparate) and low-income (disproportionate) populations.

MTA estimates that about half (49%) of the population in our service area are members of minority ethnic or racial groups. With this in mind, do you agree or disagree with the following statement?

- 1. A service change is fair to minorities as long as no more than two out of three (65%) of the riders affected by the service change are minority. Agree or Disagree

MTA estimates that 10% of the population in the service area is low-income.

With this in mind, do you agree or disagree with the following statement?

- 2. A service change is fair to low-income populations as long as no more than one out of five (20%) of the impacted riders are low-income. Agree or Disagree

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Maryland Department of Transportation

Fare Change Policy

When fare changes are proposed, MTA looks closely at pass types (day, weekly, and monthly) that riders from minority and low-income populations are more likely to use.

Do you agree or disagree with the following statement?

1. It is acceptable for a fare change to increase the cost of the pass type most often purchased by riders from low income and minority populations 15% higher than the pass type most often purchased by all other riders. Agree or Disagree

Public Participation

In order to expand public access to MTA's decision-making process, we would like to know the best way of providing information to our customers and receiving input on issues. Please answer the following:

1. What is the best way to notify you about an upcoming meeting or event?
(Please rank 1 - 8 with 1 being the highest ranking)

☐ Email notice ☐ Postcard or letter in mail ☐ Ad in newspaper ☐ MTA's website ☐ Radio ☐ Television
☐ Announcement from community group ☐ Telephone ☐ Other (please list) _____

2. In addition to a meeting, how likely would you be to use the following to express your views on MTA-related issues?
(1) Very likely (2) Somewhat likely (3) Not Likely

☐ Online survey ☐ Online discussion ☐ Comments by email ☐ Mail-back survey
☐ Focus group ☐ Write letter ☐ Phone comment line ☐ Other suggestions

The following questions are optional

What is your Race/Ethnicity? _____

What is your Approximate Income? _____

What Primary Language do you speak? _____

Do you speak a Secondary Language? Yes or No If yes, please list language spoken. _____

AppendixB

MTA Survey on Proposed Title VI Policies - Results

In June 2014 MTA collected 858 total responses (634 paper responses, 224 online responses) to its survey on proposed Title VI policies. This survey was administered in two ways: paper surveys were distributed at two MTA transfer points in the city of Baltimore, and an online survey was conducted through Survey Monkey.

The results are summarized by question below. Each table lists the question and percentage of responses for the paper survey, the online survey, and the combined results. Majority or plurality responses are shown in bold.

Public Input on Major Service Change Policy

Survey respondents generally agreed with the proposed major service change policy. Every type of service change proposed on the survey was considered "major" by at least a plurality of all respondents. In most cases, a large majority (>75%) of respondents found the proposed changes to be "major," indicating strong agreement with the proposed policy.

1. Is it a major service change if service starts one hour later, or ends one hour earlier?

Response	Paper Survey	Online Survey	Combined
YES	84.700%	85.268 %	84.848%
NO	13.249%	3.943%	12.704%
N/A or blank	2.05%	3.571%	2.448%

2. Is eliminating service on an entire bus or rail line a major service change?

Response	Paper Survey	Online Survey	Combined
YES	82.177%	93.304%	85.848%
NO	16.562%	2.232%	12.82%
N/A or blank	1.262%	4.464%	2.098%

3. Is eliminating service on a bus or rail line on a Saturday or Sunday a major service change?

Response	Paper Survey	Online Survey	Combined
YES	84.385%	87.500%	85.198%
NO	12.934%	7.589%	11.534%
N/A or blank	2.681%	4.911%	3.263%

4. Is it a major service change if the total miles or hours on a bus or rail line are changed by 20 or more (for example removing every 5th bus or train from the schedule)?

Response	Paper Survey	Online Survey	Combined
YES	76.498%	75.446%	76.224%
NO	19.401%	20.089%	19.580%
N/A or blank	4.101%	4.464%	4.196%

5. Is permanently changing the routing of a bus line (for example, extending or cutting part of the line) a major change?

Response	Paper Survey	Online Survey	Combined
YES	80.4421%	87.054%	82.284%
NO	18.454%	8.482%	15.851%
N/A or blank	1.104%	4.464%	1.981%

6. Is eliminating a bus stop where the next closest stop for the same bus line is 1 mile away a major service change?

Response	Paper Survey	Online Survey	Combined
YES	77.603%	79.018%	77.972%
NO	20.82%	17.411%	19.930%
N/A or blank	1.577%	3.571%	2.098%

7. Is closing a rail station/ rail stop a major service change?

Response	Paper Survey	Online Survey	Combined
YES	84.543%	91.964%	86.480%
NO	14.353%	3.125%	11.422%
N/A or blank	1.104%	4.911%	2.098%

8. Is opening a new rail station/rail stop a major service change?

Response	Paper Survey	Online Survey	Combined
YES	68.927%	80.357%	71.911%
NO	29.495%	14.732%	25.641%
N/A or blank	1.577%	4.911%	2.448%

Public Input on Disparate Impact and Disproportionate Burden Policies

In general, survey respondents were split on whether they agreed with the proposed disparate impact and disproportionate burden policies. However it is worth noting that less than half the respondents disagreed and the difference between those who agreed and disagreed was small, compared to the strong levels of agreement (>75%) shown regarding the major service change policy.

One notable objection was to the proposed fare change threshold. Over 58% of the survey respondents disagreed that it is acceptable if a fare increase for pass types most often purchased by riders from low-income and minority populations were 15% higher than the pass types most often purchased by all other riders. For this reason, MTA reduced the acceptable threshold from 15 to a 10 percentage point difference.

9. MTA estimates that about half (49%) of the population in our service area are members of minority ethnic or racial groups. With this in mind, do you agree or disagree with the following statement? A service change is fair to minorities as long as no more than two out of three (65%) of the riders affected by the service change are minority.

Response	Paper Survey	Online Survey	Combined
AGREE	48.423%	27.232%	42.890%
DISAGREE	44.795%	63.393%	49.650%
N/A or blank	6.782%	9.375%	7.459%

10. MTA estimates that 10 of the population in the service area is low-income. With this in mind, do you agree or disagree with the following statement? A service change is fair to low-income populations as long as no more than one out of five (20) of the impacted riders are low-income.

Response	Paper Survey	Online Survey	Combined
AGREE	45.899%	33.929%	42.774%
DISAGREE	47.003%	56.696%	49.534%
N/A or blank	7.098%	9.375%	7.692%

11. When fare changes are proposed, MTA looks closely at pass types (day, weekly, and monthly) that riders from minority and low-income populations are more likely to use. Do you agree or disagree with the following statement? It is acceptable for a fare change to increase the cost of the pass type most often purchased by riders from low-income and minority populations 15 higher than the pass type most often purchased by all other riders?

Response	Paper Survey	Online Survey	Combined
AGREE	32.334%	20.531%	29.254%
DISAGREE	53.470%	69.643%	57.692%
N/A or blank	14.196%	9.821%	13.054%

Public Input on Public Participation Strategies

Overall, survey respondents identified email and radio messages as the preferred ways to be notified of upcoming meeting or events. MTA's website, postcard/letter in mail, television, and newspaper ads were also preferred means of notification. Survey respondents indicated that they would be most likely to provide input on MTA-related issues via online survey, mail-back survey, and comments by email.

12. In order to expand public access to MTA's decision-making process, we would like to know the best way of providing information to our customers and receiving input on issues. Please answer the following: What is the best way to notify you about an upcoming meeting or event? (Please rank 1- 8 with 1 being the highest ranking)

This question asked the respondent to rank eight methods of communication, from the best to the worst way to make contact. Many respondents to the paper survey did not rank the methods and instead marked one or a few methods as favorable. On the other hand, all online respondents ranked all eight methods. Because of this difference between the two pools of respondents, a combined ranking was not made.

Email and radio messages were marked as better means of notification (ranked 1-4) by many respondents in both online and paper responses. Email, the MTA website, and postcards and mailings

were the top three responses on the online survey. Television, email, and newspaper ads were the top three responses on the paper survey.

The two pools of responses are shown separately. Both tables show results as a percentage of all responses. For example, there were 1215 selections made on the paper survey. 134 respondents marked "Ad/News" as the number one way to contact them - 11.029% of 1215. All online respondents ranked all eight methods, so although there are fewer respondents, they made more selections. 113 people marked "Email" as the number one way to contact them - 7.523% of 1502 selections.

The top three "favorable" methods (ranked 1-4) for each survey are shown in bold.

PAPER	1	2	3	4	5	6	7	8
Ad/News	11.029%	0.247%	0.247%	1.893%	0 %	0 %	1.07%	0%
MTA Website	1.564%	0.494 %	1.564%	1.07%	0%	0.823 %	0.988 %	0%
Radio	9.136%	1.564%	0.247%	0.988 %	1.07%	0%	0.823 %	0%
Television	15.638%	0.494%	2.305%	0%	0%	1.07 %	0 %	0%
Telephone	5.926%	2.305 %	0.741%	0%	0.823%	1.07%	0 %	0%
Announcement from Community Group	4.691%	0%	0.988%	0%	1.07%	0%	0.988%	1.893%
Email	2.757%	0.247%	0.494%	0%	0%	0%	0%	2.058%
Postcard or letter in mail	7.243%	0%	1.317%	0%	0%	0%	1.07%	0%

ONLINE	1	2	3	4	5	6	7	8
Ad/News	0.199%	0.266%	0.599%	0.932%	1.332%	1.931%	5.26%	1.997%
MTA Website	2.397%	4.794%	1.731%	0.999%	1.065%	0.399%	0.666%	0.466%
Radio	0.399%	1.198%	3.995%	2.197%	1.265%	1.598%	0.799%	1.065%
Television	1.198%	1.465%	1.731%	1.731%	1.398%	3.862%	0.866%	0.266%
Telephone	0.399%	0.533%	0.533%	1.065%	0.866%	1.265%	2.064%	5.792%
Announcement from Community Group	0.133%	0.666%	0.799%	1.198%	4.328%	2.13%	1.864%	1.398%
Email	7.523%	1.731%	0.799%	0.866%	0.533%	0.399%	0.133%	0.466%
Postcard or letter in mail	0.266%	1.864%	2.33%	3.523%	1.731%	0.932%	0.866%	0.932%

13. In addition to a meeting, how likely would you be to use the following to express your views on MTA-related issues?

This question also resulted in a difference between paper and online responses. Again, many respondents to the paper survey did not rank the methods; they checked those they preferred. A majority of respondents to the paper survey left some or all of the selections blank.

The following tables show the responses from the paper and online surveys, respectively. Each cell shows the percentage of survey respondents that marked that selection. For example, there were 634 respondents to the paper survey. 219 respondents marked "Online Survey" as something they would "very likely" participate in - 34.543% of 634 respondents.

PAPER	1 (very likely)	2 (somewhat likely)	3 (not likely)	n/a or blank
Online Survey	34.543%	2.997%	2.050%	60.410%
Online Discussion	6.782%	5.994%	5.521%	81.703%
Comments by Email	16.877%	4.574%	3.628%	74.921%
Mail-back survey	23.028%	4.890%	5.205%	66.877%
Focus group	11.199%	3.943%	7.097%	77.760%
Write letter	16.719%	1.893%	9.464%	71.924%
Phone comment line	16.246%	3.785%	4.890%	75.079%
other	0.789%	0.315%	3.312%	95.110%

ONLINE	1 (very likely)	2 (somewhat likely)	3 (not likely)	n/a or blank
Online Survey	74.107%	8.929%	0.446%	16.518%
Online Discussion	37.054%	33.036%	12.054%	17.411%
Comments by Email	55.357%	24.107%	2.679%	17.857%
Mail-back survey	33.929%	25.446%	22.321%	18.304%
Focus group	25.446%	40.625%	16.518%	17.411%
Write letter	14.732%	38.393%	27.679%	27.679%
Phone comment line	23.661%	28.571%	29.911%	17.857%
other	10.268%	25.446%	15.625%	48.661%

Demographic Information

The following questions in the survey were given as "optional." These percentages are of all respondents who answered these questions. Blank responses were not included in these percentages.

14. What is your race/ ethnicity?

610 respondents answered this question (467 on paper and 143 online).

RACE	PAPER	ONLINE	COMBINED
Black	89.722%	41.259%	78.361%
White	4.283%	51.049%	15.246%
Hispanic	1.285%	2.098%	1.475%
Native American	0.857%	0%	0.656%
Two or more races	1.713%	2.797%	1.967%
Asian/Pacific Islander	0%	2.098%	0.492%
Other	2.141%	0.699%	1.803%

15. What is your approximate income?

433 respondents answered this question (312 on paper and 121 online). The summary below classifies each response as above or below poverty level. In this case poverty level is defined as \$20,000 annual income or less. Each cell shows the percentage of respondents that answered this question. For example, 155 respondents to the paper survey listed their income as \$20,000 per year or less - 49.679% of 312 respondents.

	Below Poverty level	Above Poverty level
PAPER	49.679%	50.321%
ONLINE	19.008%	80.992%
COMBINED	41.109 %	58.891%

16. What primary language do you speak?

English was given as the primary language by the vast majority of all respondents and by all online respondents. There were 614 responses to this question (507 on paper and 107 online). Four different primary languages were given by respondents. Each cell shows the percentage of respondents who provided an answer.

Primary language	PAPER	ONLINE	COMBINED
English	91.913%	100%	93.322%
Spanish	2.367%	0%	1.954%
German	0.592%	0%	0.489%
Bukusu	0.394%	0%	0.326%

Secondary languages included Spanish, French, American Sign Language, Swahili, Dutch, Czech, Arabic, Ukrainian, and Italian. Few responses listed a secondary language.



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
James T. Smith, Jr., Secretary • Robert L. Smith, Administrator

APPROVAL SIGNATURE PAGE

I hereby acknowledge the receipt of the Maryland Transit Administration's (MTA) Title VI Implementation Plan 2014-2017. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration recipients.

Robert L. Smith, Administrator
Maryland Transit Administration

Date

8/14/14

Title VI Service Development Liaison Responsibilities:

- Supply all data and statistical information to Title VI Coordinator for the annual report and update
- Work with Bus Operations Department to assess the assignment of vehicles to routes (to ensure that the newest vehicles are being assigned on an equitable basis)
- Ensure assessments and service analyses are being completed, reported and that any required mitigation plans are being developed
- Ensure the implementation of GIS mapping of service areas and routes relative to population and income characteristics utilizing census data and demographic data provided by the United States Census and the Baltimore Metropolitan Council.
- Confer with Title VI Coordinator for guidance when making any changes to existing service or transit amenities to ensure active public participation.

4. Education & Training

MTA employees (full-time, part-time, contractual, and temporary personnel) are encouraged to participate in professional development and training courses and workshops. Notification and materials received by the agency on training and education opportunities are made available via the intranet, email and Management.

Office of Administrative Training

The mission of the MTA Office of Administrative Training is to provide quality and innovative learning programs, tools, and resources necessary to:

- enable MTA employees to reach their professional and career goals
- assist the MTA in maintaining a well-trained, skilled, and professional workforce
- support the training needs of locally operated transit systems statewide

During Employee Orientation Training, completion of Title VI and the Americans with Disabilities Act (ADA) courses are requirements for all new MTA employees and existing employees whom are promoted. MTA Deputy Administrators, Directors, Supervisors, union and staff employees are also required to complete these courses.

Registration Process

The registration process is generated by Human Resources (HR). They provide the Office of Administrative Training with the list of names for the new employees and their start date. Administrative Training staff will then send HR a schedule to forward to the new employee when they come in for processing.

The Sample Letter below is sent to Managers/Supervisors informing them that Orientation classes are required for their staff.



Date: 10/02/13

Good Afternoon,

The office of Administrative Training will be hosting the Maryland Transit Administration's (MTA) monthly employee Orientation for new and promoted employees on 10/21-25/2013

Three of your employees, **(Gary Brown, Pamela Turner, and Courtney Bridgers)** are scheduled to attend New Employee Orientation (NEO). We hope that communicating with you directly will help to diminish any concerns you may have about your employee attending Orientation.

We have attached the Orientation Schedule for your review so that you may distribute it to the new or promoted employees. As a reminder, the repertoire of classes is **mandated** by either the MTA, local, state or federal guidelines.

While your employee (s) is with us in Orientation, we ask that you insure the employee is paid for an 8-hour day for each of the days attended.

(This applies to promoted or department change employees' only)

If someone is absent on any day, we ask that they notify their direct supervisor.

Your employee (s) will be returning to you on Monday, 10/28/13 and we hope that with the training, the employee comes to you with a heightened sense of our customers' needs and a greater picture of their role within MTA.

For any questions or concerns please contact me by telephone at (410) 767-0707 or by email at mmason@mta.maryland.gov or contact our Administrative Support persons

Nadine Lewis at (410) 767-3850 or email at nlewis4@mta.maryland.gov

Nekia Bishop at (410) 767-2791 or email at NBishop@mta.maryland.gov

Please Send Confirmation!

Sincerely,

Marvin Mason
Project Manager

Sample - Orientation Schedule
Note: Title VI Class – 7/25/13

NEW EMPLOYEE ORIENTATION SCHEDULE JULY 22-26, 2013

Monday, 07/22

6 Saint Paul Street
20th fl. Conference Rm
Rm# 2007

7:30-8:30	Welcome and Distribution of Material
8:30-9:00	Guest Speaker
9:00-12:00	MTA Mission & Customer Service- <i>Richard Dignan</i>
12:00-1:00	Lunch
1:00-4:30	Substance Abuse- <i>Patricia Johnson</i>

Tuesday, 07/23

6 Saint Paul Street
20th fl Conference Rm
Rm# 2007

8:00-10:00	Workplace Violence- <i>Janet McNally</i>
10:00-11:00	Domestic Violence- <i>Janet McNally</i>
11:00-12:00	Sexual Harassment- <i>Janet McNally</i>
12:00-1:00	Lunch
1:00-5:00	Driver Improvement Training (DIP)- <i>Marvin Mason</i>

Wednesday 07/24

6 Saint Paul Street
20th fl Conference Rm
Rm# 2007

8:00-12:00	TARR (Terrorist Activity Recognition/Reaction) – <i>Mike Brown</i>
12:00-1:00	Lunch
1:00-2:00	Operations Compliance & Investigations- <i>Alyson Davis</i>
2:00-3:00	Ethics Training- <i>Marvin Mason</i>
3:00-5:00	HR Topics- <i>Patricia Clayton , Patricia Johnson</i>

Thursday 07/25

6 Saint Paul Street
20th fl Conference Rm
Rm# 2007

8:00-11:00	Anger Management- <i>Elizabeth Coyle</i>
11:00-12:00	Lunch
12:00-2:00	Americans with Disabilities Act and you- <i>Michele Gardner</i>
2:00-5:00	Title VI- <i>Cynthia Knight</i>

Friday 07/26

6 Saint Paul Street
20th fl. Conference Rm
Rm# 2007

8:00-9:00	System Safety- <i>Joseph Tebo, Yvette Muhammad</i>
9:00-12:00	Infectious Disease- <i>Manual Gonzalez</i>
12:00-1:00	Lunch
1:00-4:00	Racial Acceptance- <i>Chester A. France</i>
4:00-4:30	Rap Up and Evaluations- <i>Marvin Mason</i>

Project Manager

Marvin Mason

(410) 767-0707 or MMason@mta.maryland.gov

Administrative Support:

Nadine Lewis (410) 767-3850 or NLewis4@mta.maryland.gov

Nekia Bishop (410) 767-2791 or NBishop@mta.maryland.gov.

Examples of Workshop Description & Schedule -

New Employee Training - Maryland Transit Administration Title VI and Limited English Proficiency

Presenter and Workshop Coordinator:

Bruce L. Adelson, Esq.
Federal Compliance Consulting
11808 Becket Street
Potomac, Maryland 20854
301-762-5272 office
240-536-9192 fax
badelson1@comcast.net

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Abstract: Title VI of the Civil Rights Act of 1964 prohibits discrimination by federal financial assistance recipients based on race, color or national origin. Federal law equates national origin discrimination with non-English language-based discrimination. Title VI thus requires that federal aid recipients, such as transit agencies and transportation departments, open their services to all individuals by providing people who cannot speak English well with assistance in their own languages. The Title VI mandate applies to all entities that receive any federal assistance, no matter the amount. Violation of Title VI can result in the recipients' loss of federal funds, federal audits, and liability for monetary damages and injunctive relief in federal court.

Workshop Description:

With millions of limited English proficient (LEP) people living in the United States and more than 50 million people in the U.S. speaking a language other than English at home (2000 Census), issues surrounding Title VI and national origin discrimination are now especially timely.

This workshop will provide an overview of Title VI and its application to transit agencies and transportation departments that receive federal funding. Following the overview, there will be a discussion of what constitutes a "recipient of federal financial assistance" and how this definition applies to transportation agencies. Transportation managers, decision makers, and front line staff need to learn about the application of Title VI to insulate themselves from liability and federal/state government investigation since Title VI affects every aspect of their operation that receives federal funds – such as: ticket machines, schedules, train and bus stations, and highway courtesy vans.

To facilitate this understanding, there will be a discussion of how federal financial assistance recipients can comply with the federal mandate. The first step toward compliance is the recipients' application of the U.S. Department of Justice's (DOJ) four-factor analysis to the provision of services for LEP people. Federal agencies and their recipients use this analysis to determine how to comply with Title VI. The analysis treats each recipient's federally assisted program differently. The extent to which a recipient must provide "meaningful access" to its programs for LEP people will depend upon the "nature and importance" of the services provided. For example, DOJ regards the services that transportation agencies provide as important and essential to the community. Accordingly, such agencies have a high threshold to meet concerning Title VI compliance and ensuring "meaningful access" to their services by the LEP population.

The second step is recipients' preparation of five-point LEP Plans, as required by federal regulations and guidance. The development of, and subsequent compliance with, an LEP Plan is essential because the plan's existence and effective implementation can show compliance with Title VI, both

to a court, in case of suit, and to the federal funder, in case of complaint against the recipient. The workshop will include discussion of the four-factor analysis, preparation of and continuing adherence to LEP Plans.

The remainder of the workshop will include hypotheticals about how various recipients dealt with Title VI and its mandate to provide “meaningful access” to government services for LEP individuals. The hypos will enable participants to learn how to avoid common pitfalls that other federal assistance recipients, including transportation agencies, could not.

Learning Objectives:

This workshop has four learning objectives and will:

- provide participants with a basic understanding and awareness of Title VI, its application to them and their work as well as the consequences for non-compliance with the law;
- provide participants with sufficient information for them to appreciate the importance of assessing their local LEP communities’ needs;
- provide participants with sufficient information for them to begin applying the four-factor analysis to their programs to give meaning to their LEP plans; and
- provide participants with sufficient information to begin giving LEP people “meaningful access” to their programs and services.

Workshop Schedule

- Welcome, Introductions, and The Heart of Title VI - Overview of Title VI, Executive Order 13166, DOJ’s Four-Factor Analysis, and Limited English Proficiency requirements - the law’s history, background, and application to transportation agencies.
- Break
- Interactive Exercise – What is a federal financial assistance recipient and its obligations under Title VI? The answer may surprise you. This will involve group discussion of a controversial Title VI federal court case involving a famous definition of a federal assistance recipient.
- LEP and the Four-Factor Analysis – Taking the first step toward compliance. This will include discussion and analysis of the November 2005 GAO Report on LEP and DOT
- Break
- Team-Building Interactive Exercise – LEP Plans – Making them a key component of your transit operations. This will include:
 - Using Census and American Community Survey data effectively;
 - Creating a workable and legally compliant LEP outreach plan;
 - Utilizing trained staff for interpretation and translation;
 - Implementing quality control protocols for outside language assistance contractors;
 - Creating a Title VI training program for all staff who interact with the public; and
 - Having cost-effective alternatives to interpreters and translators.

Maryland Transit Administration Training Problem - Drafting an LEP Plan

By Bruce L. Adelson © Bruce L. Adelson, 2007 All Rights Reserved

You are the director of a transportation agency that receives federal funds. Your agency serves Jonesburg, a large city of 1 million people, with train, bus, and subway service. Of Jonesburg's population, 100,000 people are limited English proficient. They speak four different languages.

- 55,000 people are LEP and speak primarily Russian
- 30,000 people are LEP and speak primarily Italian
- 12,000 people are LEP and speak primarily Vietnamese
- 3,000 people are LEP and speak primarily Haitian Creole

Of these four groups, the Russian-speakers use your transportation services the least, partly because no bus and train lines come near their community. Your staff informs you that Russian-speakers would increase their rider ship if the government extended train and bus lines to make them more convenient for their neighborhoods. Your federal funder has notified you that your agency's LEP Plan is insufficient and does not satisfy U.S. DOT rules and other federal regulations. The federal government has directed you to draft a new plan that complies with federal law.

Title VI Administrative Training Liaison Responsibilities:

- Evaluate and monitor compliance with Title VI Requirements in all aspects of the education and training program
- Provide information on training opportunities open to MTA staff and sub recipients, including information on training provided by the Maryland Department of Transportation (MDOT)
- Assist Title VI Coordinator in the distribution of information to MTA staff on training programs regarding Title VI and related statutes
- Ensure equal access to, and participation in, applicable courses for qualified employees
- Track staff participation in Title VI courses and submit to Title VI Coordinator

IX. MTA Title VI Assurances

The FTA Civil Rights Assurance is incorporated in the Annual Certifications and Assurances submitted annually to FTA through the Transportation Electronic Award and Management (TEAM) system. MTA executed its FY 2013 Annual Certifications and Assurances in TEAM on 2/21/2013. MTA checked as applicable, 01. Certifications and Assurances required of all applicants. This is the category where the nondiscrimination assurance is located.



X. APPENDICES

APPENDIX A – Title VI Notice to the Public



Maryland Transit Administration (MTA) Title VI Notice to the Public

Maryland Transit Administration (MTA) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which MTA receives Federal financial assistance.

To request a copy of our Title VI Plan or additional information on the nondiscrimination policy, contact MTA's Office of Fair Practices at 410-767-3944. You may also request information in an alternative format in accordance with ADA and LEP regulations. MTA offers a variety of resources/services in Spanish, Russian, Korean, etc. Services include but are not limited to the following: oral interpreters, written language services and translations of vital documents.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or subjected to discrimination under any Maryland Transit Administration (MTA) service, program or activity, and believes the discrimination is based upon race, color, national origin, economic status or limited English proficiency has the right to file a formal complaint.

Complaints will be accepted in writing and may be filed with MTA's Office of Fair Practices, 6 St. Paul Street, 20th floor Baltimore, Maryland 21202-1614. A signed written complaint must be submitted within 180 days of the alleged discriminatory act. Complaint Forms can also be obtained on MTA's website at www.mta.maryland.gov. Individuals may also file complaints directly with the U.S. Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590 within the 180 day timeframe.

If information is needed in another language, contact (410) 767-3944

Si necesita información en otro idioma, póngase en contacto (410) 767-3944

Если нужна информация на другом языке, контактный номер телефона (410) 767-3944

MTA Communication Network

(Internal Locations where Notice is posted)

DEPARTMENT	DIRECTOR	PHONE	STAFF
Administrator's Office	Robert Smith	410-767-3943	6
Legal	Byron Smith	410-767-3872	12
Performance Management	Phillip Sullivan (Acting)	443-504-4661	7
MTA Police	John Gavrilis	410-454-1629	200
External Affairs	Jim Knighton	410-767-3905	5
Internal Audits	Channel Sumpter	410-767-3747	2
Media Relations	Paulette Austrich	410-767-3932	7
Finance	Whitney Tantleff	410-767-6044	27
Fair Practices	Paula Cullings	410-767-3934	6
Public Affairs & Communications	Simone C. Johnson	410-767-3931	10
Safety	Bernadette Bridges	410-454-7145	50
Labor & Employee Relations	Brian Williams	410-767-3854	5
Human Resources	Robin Henry (acting)	410-767-8365	32
Dep. Admin. & Chief Admin.	Simon Taylor	410-767-8374	5
Sen. Dep. Admin. & COO		410-767-8769	6
Transit Devel. & Delivery	Henry Kay	443-451-3721	10
Dep. CAO Support Svcs.	Nancy Noonan	410-767-3796	5
Statewide Service Devel.	Pat Keller	410-767-3889	5
Dep. CAO & Chief Eng.	Steve Silva	410-767-3806	25
Service Oversight	Ricky DeGraffenreid	410-454-7795	4
Information Tech. Group	Ron Nizer	410-767-3890	37
Oper. Compliance & Invest.	Tom Burgess	410-454-7122	7
Treasury	Larry Jackson	410-454-7946	50
Local Transit Support	Beth Kreider	410-767-3433	8
Operations Training	Michael Wiedecker	410-454-7199	3
Metro	Jason Lurz	410-454-7616	8
Operations Technology	Lola Stefanelli	410-454-1805	5
Procurement	Heidi Tarleton (acting)	410-767-0820	15
Planning	Diane Ratcliff	410-767-3787	6
Service Quality	Kim Bush	410-454-7748	30

MTA Communication Network

(Internal Locations where Notice is posted)

DEPARTMENT	DIRECTOR	PHONE	STAFF
Mobility		410-764-7434	131
MARC & Commuter Bus	John Hovatter	410-454-7265	31
Service Development	Michael Walk (Acting)	410-454-7257	12
Customer Relations	Chrys Wilson (acting)	410-767-8348	89
Bus Transportation		410-454-7171	19
Light Rail		410-454-7616	210
Bus Maintenance	David Varner	410-454-7074	133
Operations Training		443-506-7618	3
Internal Compliance		410-454-7710	3
Maint/Transp –Eastern Division	Jose Barreda	410-454-7688	361
Maintenance/Transp/ – Kirk Division	Ronald Clash	410-454-7450	313
Maint/Transp – Bush	Karen Harris	410-454-7166	345
Maint/Transp – Northwest	Constancia Varner	410-454-7452	415
Metro – Facilities Maint.	Gwen Baxter	410-454-1800	30
Metro – Rail Car Maint. - Wabash	Wilson Wallace	410-454-7374	70
Metro – Service Quality – OCC	Jill Williams	410-454-7733	35
Metro – Systems Maintenance	John Redmon	410-454-1827	80
Inventory/Storeroom - Wabash	William Neidhardt	410-454-7652	6
Money Room/Revenue Control - Blvd	Angie Banks	410-454-7041	45
Bush – Main Shop	Karl Wheeler	410-454-7189	63
Bush – Shop Support	Rich Wilt	410-454-7128	9
Bush – Body Shop	Jaime Harvey	410-454-7169	41
Print Shop	Steve Wimbrow	410-454-7155	10
Certification – Lobby 6 St. Paul		410-767-4833	13
Access Control - OCC	Daniel Moore	410-454-7701	5
Fleet services – Wash. Blvd.	Junal Garnett	410-454-7134	4
Procurement/Inventory	Louis Fitch	410-454-7911	4

Notifying Beneficiaries Of Their Rights Under Title VI

Title VI Brochure Page 1 (English)

The brochure features a large image of a white MTA bus on the left. The right side has a dark background with orange and white text and graphics. It includes a section on LEP rights, a 'How to File a Complaint' section with bullet points, and a 'Public Involvement' section. The bottom right corner shows a collage of people and transit modes.

TITLE VI AND LIMITED ENGLISH PROFICIENCY (LEP)

On August 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency. Executive Order 13166 obligates departments of transportation and sub-recipients to make certain that people of Limited English Proficiency (LEP) have "meaningful access to the programs, services, and information" they provide.

Who is an LEP Person?

Persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English can be limited English proficient, or "LEP."

What does LEP Require?

Executive Order 13166 requires MTA to identify geographic areas within its service area, that contain a certain percentage of individuals who have a limited ability to speak or understand English. If a certain percent of the population is deficient in English, the MTA must ensure that key documents and vital information about projects, programs and services are available in the language, of the LEP population. For example, MTA may be required to provide interpreters at public meetings.

HOW TO FILE A COMPLAINT

If you believe you have been subjected to discrimination under Title VI based on your race, color, national origin, or any aspect of this policy, you may file a complaint up to 180 days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing to:
Office of Fair Practices
Maryland Transit Administration
6 Saint Paul Street
Baltimore, Maryland 21202
www.mtamaryland.com
410-767-3944

MARYLAND TRANSIT ADMINISTRATION
TITLE VI
YOUR RIGHTS UNDER THE CIVIL RIGHTS ACT OF 1964

LOCAL BUS
METRO SUBWAY
LIGHT RAIL

MARC TRAIN
COMMUTER BUS
MOBILITY

MTA Maryland
Martin O'Malley, Governor
6109 7th
YOUR RIDE IS HERE.
Maryland Department of Transportation

Title VI Brochure Page 2 (English)

The brochure features a dark background with orange and white text and graphics. It includes a large 'TITLE VI' header, a 'Public Involvement' section, a 'Title VI & Environmental Justice' section, and a 'Discrimination Prohibited by Title VI' section. The bottom right corner shows a collage of people and transit modes.

TITLE VI

MTA FAIR PRACTICE POLICY (TITLE VI)

The Maryland Transit Administration (MTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

WHAT IS TITLE VI OF THE CIVIL RIGHTS ACT OF 1964?

Title VI provides as follows: "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under a program or activity receiving federal financial assistance." [42 U.S.C. 2000d]. In addition to prohibiting discrimination on the basis of race, color, or national origin, Title VI requires the MTA and its sub-recipients to consider the effects its programs and activities may have upon minority and low income communities.

DISCRIMINATION PROHIBITED BY TITLE VI

There are many forms of illegal discrimination based on race, color, or national origin that limit the opportunity of minorities to gain equal access to services and programs. Among other things, in operating a federally-assisted program the MTA and its sub-recipients

cannot on the basis of race, color, or national origin, either directly or indirectly:

- Deny program services, aids, or benefits
- Provide a different service, aid, or benefit, or provide them in a manner differently than they are provided to others
- Segregate or separately treat individuals in any matter related to the receipt of any services, aid, or benefit

TITLE VI & ENVIRONMENTAL JUSTICE

On February 11, 1994, President Clinton signed Executive Order 12898: Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations. The Executive Order provides that "each agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations." In support of Executive Order 12898, the U.S. DOT issued an Order on Environmental Justice (DOT Order 5610.2). This order clarifies and reinforces Title VI responsibilities in federally financed transportation projects.

PUBLIC INVOLVEMENT

Another integral component of Environmental Justice is public involvement in the planning and development of transportation projects. The DOT Order (5610.2) on Environmental Justice directs departments of transportation and sub-recipients to provide minority and low-income populations greater access to information on and opportunities for public participation in matters that may impact their health and environment. Public participation is accomplished in a variety of ways such as public hearings, open houses, and community outreach. The MTA strives for public involvement as early as possible in the planning and development stages of major transportation projects.

MTA Maryland
6109 7th
YOUR RIDE IS HERE.
Maryland Department of Transportation

APPENDIX B – Title VI Complaint Procedures & Complaint Form

MTA Procedure for Handling Title VI Complaints

1.0 Purpose

This complaint procedure is designed to provide guidance on the identification, reporting and investigation of complaints asserting claims arising under Title VI of the Civil Rights Act of 1964, as amended, and its implementing regulations (“Title VI”). Title VI prohibits discrimination on the basis of race, color and national origin and provides that no person shall be excluded from participation, denied the benefits of, or be subjected to discrimination under any federally-funded program or activity, including the services and other transit-related benefits provided by the Maryland Transit Administration (MTA). Title VI does not cover employment-related discrimination complaints arising under Title VII of the Civil Rights Act of 1964 and other statutes, all of which are governed by other policy instructions.

2.0 Scope

This procedure applies to all MTA departments responsible for receiving, identifying reporting, processing and resolving complaints of discrimination asserted under Title VI.

3.0 DEFINITIONS

- 3.1 **Administrative Closure:** A complaint that is closed without an investigation.
- 3.2 **Complainant:** An individual who files a Title VI complaint.
- 3.3 **Discrimination:** Any act or any failure to act, which has the effect of excluding or denying a person from participation in benefits, or has otherwise, subjected a person to unequal treatment under any program or activity, including transit service and other benefits, because of race, color, or national origin.
- 3.4 **Title VI Complaint:** A complaint alleging a violation of Title VI made by a complainant, usually a customer, and filed with the MTA Office of Fair Practices. Only complaints alleging discriminating in transit services and related benefits provided by MTA on the basis of race, color or national origin discrimination will be considered Title VI complaints for purposes of this Policy/Instruction.
- 3.5 **Title VI Program:** The system of requirements, procedures and actions adopted by the MTA and approved by the Federal Transit Administration (FTA), which are deemed necessary and appropriate to comply with Title VI, Civil Rights Act of 1964.

4.0 RESPONSIBILITIES

- 4.1 **Director, Office of Fair Practices:** Reports to the Deputy Chief Administrative Officer and is responsible for supervising the Title VI Coordinator who is responsible for processing and monitoring the Title VI Program. The Director of Office of Fair Practices shall exercise all powers delegated by the Administrator, including, but not limited to the receipt, acknowledgment, investigation, review, final disposition and reporting of Title VI complaints. Written responses to Title VI complaints will include language that states:

"MTA is committed to ensuring that no person is excluded from participation in, denied the benefits of its services or subjected to discrimination under Title VI, Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the MTA Office of Fair Practices, 6 Saint Paul Baltimore, Maryland 21202."

- 4.2 **Director, Office of Customer and Community Relations:** Reports to the Deputy Chief Operating Officer for Core Support and is responsible for receiving, identifying and forwarding Title VI complaints to the Office of Fair Practices.
- 4.3 **Transit Information Contact Center (TICC) agents and Other MTA Departments:** TICC and other MTA Departments may receive complaints alleging violation of Title VI and are responsible to forward such complaints to the Customer and Community Relations Department for processing and monitoring.

5.0 Procedure

5.1 How to file a Title VI Complaint

Title VI complaints must be filed within 180 days of the most recent allegation of discrimination. The complaint must include the following information:

- A written statement of facts supporting the allegation of discrimination, including the date of the alleged discrimination, the location and the names, addresses and telephone numbers of any witnesses;
- The complainant's name, address, telephone number or other method of communicating with the complainant;
- The type of discrimination alleged, i.e. race, color, or national origin;
- The transit service or other related benefit, which the complainant was allegedly denied;
- The complainant's signature.

The complaint must be filed in writing with the MTA Office of Fair Practices as follows:
Director, Office of Fair Practices
Maryland Transit Administration
6 Saint Paul Street, 20th floor
Baltimore, Maryland 21202

Complainants may also use the following telephone numbers and email address to initiate the filing of a complaint:

1. Transit Information Contact Center (TICC) Comment Line
410-333-2354
1-866-RIDE-MTA (Toll Free)
2. By email on MTA'S website: www.mta.maryland.gov
3. TTY for people who are hearing and/or speech impaired:
410-539-3497 – Transit Information Contact Center (TICC)
4. Upon request of the complainant, Customer Relations will assist in completing the required Complaint Form.

5.2 Internal Complaint Processing

5.2A – Assignment of Title VI Complaint Number (Office of Customer and Community Relations)

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by MTA will be recorded on the Customer Comment Database program Form Computer Screen and immediately assigned a complaint number by the Transit Information Contact Center (TICC) Comment Line or Customer Relations.

5.2B – Complaint Investigation

1. The MTA Office of Customer and Community Relations will forward all Title VI complaints it receives to the Office of Fair Practices. The Office of Customer and Community Relations will provide appropriate assistance to complainants, including those persons with disabilities or who are limited in their ability to communicate in English.
2. In instances where additional information is needed for assessment or investigation of the complaint, the Office of Fair Practices will contact the complainant in writing within 15 working days. The Office of Fair Practices will inform each complainant that failure to provide the requested information by a certain date may result in the administrative closure of the complaint.
3. The Office of Fair Practices will investigate the complaint and prepare a draft written response subject to review by the Office of Legal Counsel and the Administrator. If appropriate, the Office of Fair Practices may administratively close the complaint.

5.2C – Acknowledgment of the Complaint

The Office of Fair Practices will send a final written response to the complainant and advise the complainant of his or her right to file a complaint externally. The Office of Fair Practices will use its best efforts to respond to Title VI

complaints within 60 workdays of its receipt of such complaints.

5.3 External Redress

In addition to the complaint process at MTA, a complainant may file a Title VI complaint with the U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights - Region III Philadelphia, Pennsylvania 19103.

5.4 Freedom from Retaliation or Interference

Retaliation against or interference with a complainant's rights to file a Title VI complaint, testify, assist or participate in any manner in an investigation constitutes a violation of MTA's Title VI Program. Any MTA employee found seeking reprisals for anyone filing a Title VI complaint may be subject to termination from MTA's employment, arrest and imprisonment, or fined according to state and federal law.

6.0 Title VI Training

The Office of Fair Practices in coordination with the Office of Administrative Training will provide Title VI Training to all employees.

7.0 Monitoring and Reporting

The MTA Office of Fair Practices shall monitor the implementation of the Title VI Complaint Procedure and shall develop reports of alleged Title VI complaints and the disposition of such complaints. The MTA Office of Legal Counsel should also receive a copy of the report to aid in monitoring legal issues involving Title VI complaints. The MTA Office of Fair Practices will also ensure that the public is made aware of the avenue for filing Title VI complaints through the MTA's website, Transit Information Contact Center (TICC) and notices on MTA revenue vehicles.



Complaint of Discrimination

Complainant Information:

Name:	Telephone Number:		
Address:		W ()	H ()
City:	State:	Zip Code:	

Which MTA System was involved?

<input type="checkbox"/> MTA Local Bus: _____	<input type="checkbox"/> MTA MARC: _____
<input type="checkbox"/> MTA Commuter Bus: _____	<input type="checkbox"/> MTA Mobility: _____
<input type="checkbox"/> MTA Light Rail: _____	<input type="checkbox"/> MTA Police: _____
<input type="checkbox"/> MTA Metro Subway: _____	<input type="checkbox"/> MTA Office: _____

Name, title and address of person you believe discriminated against you:

Name:	Title:	Telephone Number:
Address:		()
City:	State:	Zip Code:

When was the last alleged discriminatory act? (Month, Day and year) _____

The alleged discrimination was based on:

- ☐ Race
☐ Color
☐ National Origin
☐ Other: _____

Describe the alleged act(s) of discrimination. (Use additional pages if necessary.)

What corrective action do you want taken on your behalf?

Have you filed a complaint alleging the same discrimination with another state or federal agency?

☐ Yes ☐ No

If yes, with what agency? _____

SIGNATURE _____

DATE _____

Please submit this form online or mail to:

Maryland Transit Administration
Office of Fair Practices, Title VI
6 St. Paul Street
Baltimore, MD 21202-1614

APPENDIX C - Public Participation Plan (see separate attachment)

Summary of Outreach Efforts

Specific Project Examples

The public participation strategy examples described below can be utilized as guides to develop a project-specific, tailored strategy, once a project is identified as having impacts on low income, minority, and LEP communities. The following examples demonstrate the level of specificity MTA could provide when developing a public participation strategy at the community level.

The following public participation strategy examples are useful for a variety of MTA project types and strategies created and implemented utilizing the principles of the PPP for specific MTA projects. Each strategy example is detailed to demonstrate how population-appropriate outreach methods can be identified and utilized to develop and conduct transportation decision-specific outreach strategies. Each strategy follows basic public participation steps:

- Identify target populations and public participation needs;
- Coordinate internally to identify methods and develop public participation strategy;
- Coordinate with Community-Based Organizations (CBO) partners when appropriate;
- Conduct outreach;
- Identify language needs per LEP Plan;
- Implement public participation strategy; and
- Compile, review, and report results.

When projects require Public Hearings the general public may choose one of the following three methods to submit their comments which are recorded in the official hearing documentations:

1. Verbal testimony at a Public Hearing.
2. Submit written statements as described in the Hearing Procedures.
3. Submit written statements via email.

Official Statement forms are available at the Public Hearing registration tables, MTA headquarters, and online at www.mta.maryland.gov. All comments, verbal and written, receive the same consideration.

Examples of Public Participation Strategy for MTA Projects

1. Light Rail Service Public Hearing

MTA conducted one hearing due to the community's concern with the relationship between the Linthicum Light Rail Station and crime occurring within the community. The community was adamant the Light Rail service provided transportation for criminals and the stop should be closed. The hearing provided the community, as well as the general public, the opportunity to provide MTA with feedback regarding the proposed changes.

- MTA proposed to reduce the daily hours of operation, for the Linthicum Light Rail Station only, at approximately 8:00 PM.
- Northbound - the last train to service the Linthicum Station will depart the Cromwell Station at 7:58 PM.
- Southbound – the last train to service the Linthicum Station will depart the North Linthicum Station at 7:53 PM, in route to Baltimore Washington Thurgood Marshall International Airport.

Hearing Date and Location

- Tuesday, May 17, 2011
5:00 PM- 8:00 PM
North County High School
Proximity to MTA transit is 0.8 miles from the Ferndale Light Rail Station.

Outreach

- Hearing notices were published in the following newspapers:
- The Baltimore Sun on April 15 and 22, 2011.
- The 'b' Paper on April 15 and 22, 2011.
- The Capital Gazette on April 20 and May 11, 2011.
- El Tiempo Latino on May 6, 2011.
- The Baltimore edition of the Afro American Newspaper on May 6, 2011.
- Car Cards were posted on seventy (70) percent of Light Rail trains.
- The hearing notice and the proposal were posted on the MTA website at www.mta.maryland.gov.
- Sandwich boards were posted at the Linthicum Light Rail Station.
- The proposal was posted in the lobby of MTA headquarters.
- MTA Transit Team radio announcements during drive-time reports, weekdays between the hours of 5:00 AM- 9:00 AM and 3:00 PM- 6:00 PM.

Examples of Public Participation Strategy for MTA Projects *(Continued)*

2. Local Bus Service Public Hearings

Three public hearings were conducted to offer the public the opportunity to provide feedback on MTA's proposed service adjustment's for Local Bus route Nos. 3, 15, 19, 27, 29, 35, 44, 47, 52, 57, 58, 61, 77, 97, and 99.

Hearing Dates and Locations

- Wednesday, May 18, 2011
12:00 PM – 6:00 PM
State Center Office Complex Auditorium Proximity to MTA transit- 0.1 mile or less from the nearest bus stop, Metro Subway station, and Light Rail stop.
- Wednesday, May 18, 2011
6:00 PM – 8:00 PM
The Center for Urban Families
Proximity to MTA transit is 0.1 miles to a bus stop and 0.4 miles to a Metro Subway station.
- Thursday, May 19, 2011
6:00 PM – 8:00 PM
Days Inn
Proximity to MTA transit is 0.1 mile to bus stop.

Outreach

- Hearing notices were published in the following newspapers:
- The Baltimore Sun on April 18 and 25, 2011.
- The 'b' Paper on April 18 and 25, 2011.
- El Tiempo Latino on May 6, 2011.
- The Baltimore edition of the Afro American Newspaper on May 6, 2011.
- The proposal was posted in the lobby of MTA headquarters.
- Rider Notices were available on buses and in Metro Subway stations.
- Car Cards were posted on eighty (80) percent of Local Buses.
- The hearing notice and the proposal were posted on the MTA website at www.mta.maryland.gov.
- MTA Transit Team radio announcements during drive-time reports, weekdays between the hours of 5:00 AM- 9:00 AM and 3:00 PM- 6:00 PM.

Examples of Public Participation Strategy for MTA Projects *(Continued)*

3. **Commuter Bus Public Hearings**

Four Public Hearings were conducted regarding additional Commuter Bus service on the new Intercounty Connector (ICC) road during morning and evening peak hours, Monday through Friday. The hearings presented the general public an opportunity to provide feedback to MTA regarding a proposal for three additional bus routes, nos. 203, 204, and 205, to operate along the ICC and other existing roads to connect riders from Columbia to the Medical Center Metro in Bethesda; from Monocacy MARC station to the College Park Metro/MARC station; and from College Park to the Germantown Transit Center.

Hearing Dates and Locations

- Tuesday, September 27, 2011
6:30 PM – 8:30 PM
Winchester Hall
1st Floor Hearing Room
12 East Church Street
Frederick, MD 21701
- Monday, October 3, 2011
12:00 PM – 2:00 PM and 6:30 PM – 8:30 PM
College Park City Hall
Council Chambers 2nd Floor
4500 Knox Road
College Park, MD 20704
- Wednesday, October 5, 2011
6:30 PM – 8:30 PM
Owen Brown Interfaith Center
7246 Cradlerock Way
Columbia, MD 21045
- Thursday, October 6, 2011
12:00 PM – 2:00 PM and 6:30 PM – 8:30 pm
City of Gaithersburg
506 South Frederick Avenue
Gaithersburg, MD 20877

Outreach

- Hearing notices were published in the following newspapers:
- August 26, 2011 – The Washington Examiner and The Washington Post.
- August 27, 2011 – The Washington Edition of the Afro American.
- September 2, 2011 – The Washington Examiner and The Washington Post.
- September 14 and 15, 2011 – The Gazette in Montgomery, Prince George's, and Frederick Counties.
- September 20, 2011 - Frederick News Post.
- September 22, 2011 - The Sentinel in Montgomery and Prince George's Counties.
- September 23, 2011 – El Tiempo Latino.
- September 29, 2011 - Howard County Times.
- September 30, 2011 – Washington Hispanic.
- The proposal was posted in the lobby of MTA headquarters.
- Notices were distributed to riders and were posted on Commuter Buses.
- The hearing notice and the proposal were posted on the MTA website at www.mta.maryland.gov.
- MTA Transit Team radio announcements during drive-time reports, weekdays between the hours of 5:00 AM- 9:00 AM and 3:00 PM- 6:00 PM.

Examples of Public Participation Strategy for MTA Projects *(Continued)*

4. Mobility Informational Open House Sessions

The MTA conducted a series of eight Informational Open House sessions where Mobility staff was available to discuss the No-Show and Conditional Eligibility policies, Travel Training, and adjustments to Mobility Service to comply with federal regulations. Maps were displayed showing the realignment of the Mobility service area implemented on May 7, 2012. The Informational Open House sessions presented Mobility customers, as well as the general public, an opportunity to meet one-on-one with Mobility staff to learn more about the subjects listed above. The opportunity also existed for participants to present their concerns and to provide feedback regarding Mobility Service to MTA.

Schedule of informational meetings:

Monday, March 5, 2012
Parkville/Carney
Towson Library
320 York Road
Towson, MD 21204-5179

Monday, March 19, 2012
Sparrows Point
North Point Library
1716 Merritt Boulevard
Baltimore, MD 21222-3295

Tuesday, March 6, 2012
Randallstown Library
8604 Liberty Road
Baltimore, MD 21133-4797

Tuesday, March 20, 2012
Owings Mills
Timber Grove Elementary School, Cafeteria
701 Academy Ave.
Baltimore, MD 21117

Tuesday, March 13, 2012
Middle River
MAA, Martin State Airport
Hanger 4, Lower Level Classroom
701 Wilson Point Road
Baltimore, MD 21220

Thursday, March 22, 2012
State Center Auditorium and Lobby
300 West Preston Street
Baltimore, MD 21201

Thursday, March 15, 2012
Catonsville Senior Center
501 N. Rolling Road
Baltimore, MD 21228

Tuesday, March 27, 2012
Glen Burnie
Pascal Senior Center, Craft Room
125 Dorsey Road
Glen Burnie, MD 21061

Outreach

- Meeting notices were published in the following newspapers:
- February 24, 2012 – The Afro American and El Tiempo Latino
- February 25, 2012 – The Sun
- February 29, 2012 – Catonsville Times and Towson Times
- March 3, 2012 - The Sun
- March 8, 2012 – Owings Mills Times
- March 17, 2012 – Maryland Gazette
- March 18, 2012 – The Sun, Anne Arundel County Edition
- Meeting notice was posted on the MTA website at www.mta.maryland.gov.
- MTA Transit Team radio announcements during drive-time reports, weekdays between the hours of 5:00 AM- 9:00 AM and 3:00 PM- 6:00 PM.

Chart of Outreach Efforts

Meeting	Location	Date and Time	Attendees	Translation Service Provided	Sign Language Provided
Light Rail Service Public Hearing	North County High School 10 E. 1 Ave Glen Burnie, MD 21061	May 17, 2011 5:00 PM- 7:00 PM 1	160	Newspaper & Proposal	Yes
Local Bus Service Public Hearing #1	State Center Office Complex 300 West Preston St Baltimore, MD 21201	May 18, 2011 12:00 PM- 6 :00 PM	37	Newspaper & Proposal	None Requested
Local Bus Service Public Hearing #2	Center for Urban Families 2201 N Monroe St Baltimore, MD 21217	May 18, 2011 6:00 PM- 8:00 PM	17	Newspaper & Proposal	None Requested
Local Bus Service Public Hearing #3	Days Inn 5701 Baltimore National Pike Baltimore, MD 21228	May 19,2011 6:00 PM- 8:00 PM	3	Newspaper & Proposal	None Requested
Commuter Bus Service Public Hearing #1	Winchester Hall 1st Floor Hearing Room 12 East Church St Frederick, MD 21701	September 27, 2011 6:30 PM- 8:30 PM	4	Newspaper & Proposal	None Requested
Commuter Bus Service Public Hearing #2	College Park City Hall Council Chambers, 2nd Fl. 4500 Knox Rd College Park, MD 20704	October 3, 2011 12:00 PM – 2:00 PM and 6:30 PM – 8:30 PM	2 2	Newspaper & Proposal	None Requested
Commuter Bus Service Public Hearing #3	Owen Brown Interfaith Center 7246 Cradlerock Way Columbia, MD 21045	October 5, 2011 6:30 PM – 8:30 PM	2	Newspaper & Proposal	None Requested
Commuter Bus Service Public Hearing #4	City of Gaithersburg 506 South Frederick Ave Gaithersburg, MD 20877	October 6, 2011 12:00 PM – 2:00 PM and 6:30 PM – 8:30 PM	3	Newspaper & Proposal	None Requested

Chart of Outreach Efforts

Meeting	Location	Date and Time	Attendees	Translation Service Provided	Sign Language Provided
Mobility Informational Open House Session #1	Towson Library 320 York Rd Towson, MD 21204-5179	March 5, 2012 6:00 PM- 8:00 PM	20	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #2	Randallstown Library 8604 Liberty Rd Baltimore, MD 21133	March 6, 2012 6:00 PM- 8:30 PM	7	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #3	Middle River MAA, Martin State Airport Hanger 4, Lower Level Classroom 701 Wilson Point Rd Baltimore, MD 21220	March 13, 2012 6:00 PM- 8:00 PM	1	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #4	Catonsville Senior Center 501 N. Rolling Rd Baltimore, MD 21228	March 15, 2012 6:00 PM- 8:00 PM	10	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #5	Sparrows Point North Point Library 1716 Merritt Blvd Baltimore, MD 21222-3295	March 19, 2012 6:00 PM- 8:00 PM	1	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #6	Owings Mills Timber Grove Elementary School, Cafeteria 701 Academy Ave. Baltimore, MD 21117	March 20, 2012 6:30 PM- 8:30 PM	10	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #7	State Center Auditorium and Lobby 300 West Preston St Baltimore, MD 21201	March 22, 2012 6:00 PM- 8:00 PM	25	Newspaper; No printed material requested	None Requested
Mobility Informational Open House Session #8	Glen Burnie Pascal Senior Center, Craft Room 125 Dorsey Rd Glen Burnie, MD 21061	March 27, 2012 6:00 PM- 8:00 PM	7	Newspaper; No printed material requested	None Requested

APPENDIX D – Title VI Investigations, Complaints and Lawsuits

The following charts summarize the External and Internal Discrimination Complaints received by the Office of Fair Practices during Fiscal Year 2011.

SUMMARY OF EXTERNAL DISCRIMINATION COMPLAINTS — FISCAL YEAR 2011

Agency: MARYLAND TRANSIT ADMINISTRATION

Enforcement Agency: MCHR/ EEOC/DOJ/Court	Date	Summary (Basis)	Issue	Status (Disposition)
EEOC	11/3/11	Age, Race, Sex	Retaliation - Termination	No Probable Cause - Position Paper Filed
EEOC	9/8/10	Race	Harassment	No Probable Cause - Position Paper Filed
EEOC	11/4/10	Age, Race	Wages/Termination	No Probable Cause - Position Paper Filed
EEOC	9/29/10	Nat'l Origin, Race	Harassment	Dismissal- Notice of Rights Issued
MCHR	3/15/11	Age, Race	Termination	No Probable Cause - Position Paper Filed
EEOC	3/30/11	Age, Race	Termination	No Probable Cause - Position Paper Filed
EEOC	2/2/11	Race/Gender	Promotion	No Probable Cause - Position Paper Filed
EEOC	2/4/11	Race	Wages, Termination, Terms & Contions	No Probable Cause - Position Paper Filed
EEOC	2/4/11	Race	Discharge, Wages, Terms & Conditions	No Probable Cause - Position Paper Filed
EEOC/MCHR	4/22/11	Race, Nat'l Origin	Terms of Employment	No Probable Cause - Position Paper Filed
EEOC	12/10/10	Race	Discharge, Wages, Terms & Conditions	No Probable Cause - Position Paper Filed
EEOC	6/7/11	Race, Sex	Sexual & Racial Harassment & Retaliation	No Probable Cause - Position Paper Filed
EEOC	6/20/11	Race, Religion, Nat'l Origin, Retaliation	Terms of Employment	No Probable Cause - Position Paper Filed
TOTAL EXTERNAL COMPLAINTS FILED				13

SUMMARY OF EXTERNAL DISCRIMINATION COMPLAINTS — FISCAL YEAR 2010

Agency: MARYLAND TRANSIT ADMINISTRATION

Enforcement Agency: MCHR/EEOC/ DOJ/Court	Date	Summary (Basis)	Issue	Status (Disposition)
EEOC	10/22/09	Race, Sex	Retaliation, Termination	No Action Required - EEOC
EEOC	10/22/09	Race, Color, Sex, - Disability	Retaliation	No Action Required - EEOC
EEOC	10/22/09	Race, Sex	Retaliation, Termination	No Action Required - EEOC
EEOC	9/14/09	Race, Sex, Age, Disability, Retaliation	Termination	No Probable Cause - Response Sent to EEOC
TOTAL EXTERNAL COMPLAINTS FILED				4

SUMMARY OF INTERNAL DISCRIMINATION COMPLAINTS — FISCAL YEAR 2011

Agency:

MARYLAND TRANSIT ADMINISTRATION

Division/Unit	Date	Summary (Basis)	Issue	Status (Disposition)
Kirk Bus Maintenance - INF#11282010	11/28/10	Race, Gender	Harassment	Withdrawn - Mediation
Metro Maintenance - INF#04112011	4/11/11	Race	Harassment	No Probable Cause
TOTAL INTERNAL COMPLAINTS FILED				2

SUMMARY OF INTERNAL DISCRIMINATION COMPLAINTS — FISCAL YEAR 2010

Agency: MARYLAND TRANSIT ADMINISTRATION

Division/Unit	Date	Summary (Basis)	Issue	Status (Disposition)
Procurement	7/16/09	Race, Age	Promotion/Training Opportunity	No Probable Cause/ Recommendation
Bus Maintenance	8/18/09	Race, Color, Age	Promotion - Denied	No Probable Cause
Bus Maintenance	11/20/09	Race/Gender	Harassment	No Probable Cause
Light Rail	4/22/10	Race	Shift Change	No Probable Cause
Light Rail Customer	6/18/10	Race	Other	No Probable Cause
TOTAL INTERNAL COMPLAINTS FILED				5

SAMPLE LETTER #1: **ACCEPTANCE – LETTER FOR COMPLAINANT**

March 4, 2012

CONFIDENTIAL

Mr. John Doe
1234 Mocking Bird Road
Baltimore, MD 00000

Re: Case #INF000000

Dear Mr. Doe:

This office is in receipt of your Complaint of discrimination form (DTS-39). Please be advised that we will begin an official investigation into the allegations posed by your complaint.

It is both illegal and against Transportation Service Human Resources Systems (TSHRS) policy to retaliate against any employee who files a complaint of discrimination or participates in an investigation. If you feel that you are the subject of any retaliatory actions, you may contact this office or the Office of Fair Practices at The Secretary's Office.

Please be assured that this investigation will be handled in a confidential and expeditious manner. If you have any questions or concerns, please contact me at 410-767-3779.

Sincerely,

Mary S. Jane
EO Officer
MTA Office of Fair Practices

SAMPLE LETTER #2:

ACCEPTANCE – LETTER FOR RESPONDENT

March 4, 2012

CONFIDENTIAL

Mr. John Q. Public
0000 First Street
Baltimore, MD 00000

Re: Case #INF000000

Dear Mr. Public:

This office is in receipt of a Complaint of Discrimination filed against you by Mr. John Doe. Attached is a copy of the complaint for your information.

The purpose of this letter is to advise you that this office will now begin an official investigation into the allegations of the complaint. Please be assured that this investigation will be handled in a confidential and expeditious manner.

It is both illegal and against Transportation Service Human Resources System (TSHRS) policy to retaliate against any employee that files a complaint of discrimination or participates in an investigation. It is therefore imperative that no retaliatory actions be taken against Mr. Doe.

I will be contacting you to set up an appointment to get your official response to the allegations. If you have any questions or concerns prior to my contacting you, please contact me at 410-767-3779

Sincerely,

Mary S. Jane
EO Officer
MTA Office of Fair Practices

SAMPLE LETTER #3: **FINDINGS – LETTER FOR COMPLAINANT**

Mr. John Q. Public
0000 First Street
Baltimore, MD 00000

Re: Case #INF000000

Dear Mr. Public:

Please be advised that the investigation into your complaint of discrimination filed with this office has been completed. The investigation found that there is insufficient evidence to sustain the complaint and the evidence was inconclusive. Therefore, we found that there was no probable cause for the complaint of discrimination based on retaliation against Ms. Jane Doe.

You may appeal this decision to:

The Department of Budget and Management
Office of the Secretary
301 W. Preston Street
Baltimore, MD 21201

or may contact the following agencies regarding the possibility of filing a complaint:

The Maryland Human Relations Commission
6 Saint Paul Street, 9th Floor
Baltimore, MD 21202

or

The United States Equal Employment Opportunity Commission
Baltimore District Office
10 S. Howard Street, 3rd Floor
Baltimore, MD 21201

It is both illegal and against Transportation Service Human Resources System (TSHRS) policy to retaliate against any employee that either files a complaint of discrimination or participates in an investigation. If you feel that you are subject of any retaliatory actions, you may contact this office or the Office of Fair Practices at The Secretary's Office.

Should you have any further questions, please do not hesitate to contact our office at 410-767-3779. Thank you for your patience and cooperation.

Sincerely,

Mary S. Jane
EO Officer
MTA Office of Fair Practices

SAMPLE LETTER #4: **FINDINGS – LETTER FOR RESPONDENT**

Ms. Jane Doe
1234 Main Ave.
Baltimore, MD 21215

Re: Case #INF00000000

Dear Ms.:

Please be advised that the investigation into the complaint of discrimination filed against you by Mr. John Q. Public has been completed. The investigation found no probable cause for discrimination.

It is both illegal and against Transportation Service Human Resources System (TSHRS) Policy to retaliate against any employee that either files a complaint of discrimination or participates in an investigation. It is therefore imperative that no retaliatory action be taken again Mr. John Q. Public.

Should you have any further questions, please do not hesitate to contact me at 410-767-3779.

Sincerely,

Mary S. Jane
Equal Opportunity Officer

APPENDIX E – Policy for Engaging Individuals with Limited English Proficiency (LEP)



MARYLAND TRANSIT ADMINISTRATION

MARYLAND DEPARTMENT OF TRANSPORTATION

Martin O'Malley, Governor • Anthony G. Brown, Lt. Governor
Darrell B. Mobley, Acting Secretary • Ralign T. Wells, Administrator

MEMORANDUM

TO: All MTA Employees

FROM: Ralign T. Wells
Administrator

DATE: September 10, 2012

SUBJECT: Maryland Transit Administration's (MTA) Limited English Proficiency (LEP) Staff Desk Manual

On behalf of the Office of Fair Practices and the Title VI Team, we are happy to provide you with the MTA LEP Staff Desk Reference Manual. This reference manual was developed to assist MTA employees in meeting the mission of LEP requirements under Title VI of the Civil Rights Act of 1964.

It is the policy of the Maryland Department of Transportation and the MTA to ensure non-discrimination of all facets of our transit programs and services. I am personally committed to uphold the intent and spirit of Title VI of the Civil Rights Act of 1964 and subsequent federal and State regulations to the fullest extent reasonably possible. It is my goal to eliminate any form of discrimination against any person in accordance with all Federal and State statutes.

Specifically, it is the commitment and responsibility of the entire MTA to ensure that no customer be discriminated against, be excluded from participation in or be denied the benefits or services offered by the MTA based upon that individual's LEP. As Administrator, I am giving each employee of the MTA the responsibility to work cooperatively and diligently to achieve these goals and objectives. As an organization, the MTA will strive to ensure these laws are carried out in all facets.

I am fully committed to the goal of achieving equal opportunity and non-discrimination for all transit customers. My vision goes beyond meeting the requirements of compliance, but extends to ensure that transit services are available and accessible to all Marylanders. If you have any questions, please contact the Office of Fair Practices at 410-767-3944.

6 Saint Paul Street • Baltimore, Maryland 21202-1614 • TTY 410-539-3497 • Toll Free 1-866-743-3682

APPENDIX F – Table Depicting Minority Representation on Committees

PROCESS FOR ENCOURAGING MINORITY PARTICIPATION ON THE CITIZENS ADVISORY COMMITTEE (CAC) AND CITIZENS ADVISORY COMMITTEE FOR ACCESSIBLE TRANSPORTATION (CACAT)

MISSION STATEMENT:

The Maryland Transit Administration (MTA) is committed to providing the highest possible level of reliable, affordable, convenient and accessible service to all its customers. In order to establish and maintain consistent and responsive communications between the MTA and its customers, improve the quality of service from a customer's point of view, provide for direct input to management about customer perception of service, and to facilitate inclusion of customer observations into service monitoring and modification, the MTA has established the volunteer Citizens Advisory Committee (CAC) and Citizens Advisory Committee for Accessible Transportation (CACAT) committees.

RECRUITMENT PROCESS:

The Citizens Advisory Committee (CAC) and the Citizens Advisory Committee for Accessible Transportation (CACAT) recruit volunteers to participate on the committee annually. The facilitators advertise for new volunteers by placing transit advertising in English and Spanish to encourage minority and limited English proficient populations (LEP) throughout the MTA modes of transportation such as Bus, Light Rail, Metro, MARC Train Service and Commuter Bus. This includes sandwich boards throughout the Metro stations and car cards inside Buses and Light trains. The message is advertised on the MTA website. Recruitment announcements are made in the monthly meetings.

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *note	Totals
Citizens Advisory Committee (CAC)	7	6	0	0	0	0	2	15
% of CAC Committee	46.6	40.0	0	0	0	0	13.3	99.9
Citizens Advisory Committee on Accessible Transportation (CACAT)	8	5	0	0	0	0	1	14
% of CACAT Committee	57.0	35.7	0	0	0	0	7.0	99.7

**Note- Other races reported: Lithuania, Ukrainian, and Polish*

APPENDIX G – Subrecipient Compliance – Title VI Program Submissions

		November 2013							Checklist of Title VI Implementation Plans (2012-2015)		
		Submitted by sub recipients, reviewed and approved by Title VI Coordinator									
# of plans per RP	REGIONAL PLANNER	JURISDICTION	LOTS	JARC	NEW FREEDOM	SECTION 5310	SYSTEM NAME	TITLE VI PLAN SUBMITTED?	TITLE VI PLAN REVIEWED?		
1	1	Bruce Hohnacki	Allegany	X			Allegany County Transit	Yes	Yes		
2	2	Bruce Hohnacki	Frederick	X			TransIT	Yes	Yes		
3	3	Bruce Hohnacki	Garrett	X			Garrett Transit	Yes	Yes		
4	4	Bruce Hohnacki	Washington County	X			County Commuter	Yes	Yes		
5	5	Bruce Hohnacki	Washington County		X	X	Community Action Council	Yes	Yes		
1	6	Charles Grant	Baltimore County	X			Baltimore County Dept. of Aging, CountyRide	Yes	Yes		
2	7	Charles Grant	Carroll	X			Carroll County Government & Carroll Area Transit System (CATS)	Yes	Yes		
3	8	Charles Grant	Harford	X	X	X	Harford County Transportation Service (HCTS)	Yes	Yes		
4	9	Charles Grant	Cecil County	X	X	X	Cecil County Government-Senior Services & Community Transit	Yes	Yes		
5	10	Charles Grant	Baltimore		X		Maryland Rural Development Corp.	Yes	Yes		
6	11	Charles Grant	Baltimore		X		Sojourner-Douglas College Workforce Transportation & Referral Services	Yes	Yes		
7	12	Charles Grant	Baltimore		X		The League for People with Disabilities, Inc.	Yes	Yes		
1	13	James Raszewski	Dorchester County	X	X	X	Delmarva Community Services (Operator of service)	Yes	Yes		
2	14	James Raszewski	Queen Anne's	X			County Ride	Yes	Yes		
3	15	James Raszewski	Town of Ocean City	X			The Bus	Yes	Yes		
4	16	James Raszewski	Kent/Talbot/Caroline counties	X	X		Delmarva Community Services	Yes	Yes		
5	17	James Raszewski	Somerset, Wicomico, Worcester	X	X		Tri-County Council for the Lower Eastern Shore of MD (Shore Transit)	Yes	Yes		
1	18	Tracy Perez	Calvert	X			Calvert County Public Transportation (CCPT)	Yes	Yes		
2	19	Tracy Perez	Charles	X			VanGO (contracted out)	Yes	Yes		
3	20	Tracy Perez	Montgomery	X			Ride On	Yes	Yes		
4	21	Tracy Perez	Prince George's	X			The Bus	Yes	Yes		
5	22	Tracy Perez	St. Mary's	X			St. Mary's Transit Service (STS)	Yes	Yes		
# of plans per RP	REGIONAL PLANNER	JURISDICTION	LOTS	JARC	NEW FREEDOM	SECTION 5310	SYSTEM NAME	TITLE VI PLAN SUBMITTED?	TITLE VI PLAN REVIEWED?		
6	23	Tracy Perez	Calvert, Charles, St. Mary's		X		Tri-County Council for Southern Maryland	Yes	Yes		
7	24	Tracy Perez	Charles		X		LifeStyles of Maryland Foundation	Yes	Yes		
8	25	Tracy Perez	Calvert, Charles, St. Mary's		X		Southern Maryland Center for Independent Living	Yes	Yes		
1	26	Tom Holsclaw	Annapolis	X			City of Annapolis (Richard Newell, Director, Annapolis Transit)	Yes	Yes		
2	27	Tom Holsclaw	Anne Arundel		X		County Dept. of Aging & Disabilities	Yes	Yes		
3	28	Tom Holsclaw	Anne Arundel		X		Anne-Arundel Workforce Development Corp	Yes	Yes		
4	29	Tom Holsclaw	Anne Arundel		X	X	Central Maryland Regional Transit (CMRT)	Yes	Yes		
5	30	Tom Holsclaw	Howard County	X				Yes	Yes		
6	31	Tom Holsclaw	Howard & Anne Arundel counties		X		Omni House	Yes	Yes		
7	32	Tom Holsclaw	Anne Arundel		X		Partners In Care	Yes	Yes		
8	33	Tom Holsclaw	Anne Arundel		X		The BWI Business Partnership	Yes	Yes		

APPENDIX H – Inclusive Public Participation

MARC Train Riders Advisory Council

The MARC Riders Advisory Council is an independent body that strives to assist the MTA with improving MARC service. The Council consists of 15 members, all of whom are regular MARC commuters. Riders from all three lines serve on the Council, with the goal of representing an accurate cross-section of customers.

Maryland Rail Commuter (MARC) service consists of three lines covering 201 route miles, which operate in the Baltimore-Washington metropolitan area: The Penn Line from Perryville through Penn Station in Baltimore into Union Station, Washington, D.C.; the Camden Line from Camden Station, Baltimore, into Union Station; and the Brunswick Line from Martinsburg, W.V. through Point of Rocks and Rockville into Union Station. MARC service is provided under private contract with Amtrak and CSX.

The MARC Council's regular meetings, as required in the Council's by-laws, are held on the third Thursday of the month. All meetings begin at 4:30pm and are open to the public.

For further information or special assistance needs for the meeting, please contact:

Dave Johnson, Chief Customer Communications Officer
MARC Train Service
1515 Washington Boulevard
Baltimore, MD 21230
410-454-7020
Email: djohnson25@mta.maryland.gov

New Starts Projects

MTA has many exciting initiatives underway to develop new facilities and services across Maryland. Listed below are two examples of on-going current projects. The Community Outreach and Public Involvement aspects of these projects are described below.



Baltimore Red Line - A proposed 14-mile light rail line connecting the areas of Woodlawn, Edmondson Village, West Baltimore, downtown Baltimore, Harbor East, Fells Point, Canton, and the Johns Hopkins Bayview Medical Center with direct connections to existing Metro Subway, Light Rail, MARC Train and local bus services.

The Red Line is using a combination of outreach methods to communicate with community stakeholders throughout the project, including newsletters, social media, and a website.

The Red Line Community Liaisons serve as a direct link of communication between communities in the Red Line corridor and the MTA. They inform community members about the project and articulate communities' comments and concerns to the MTA. Community Liaisons are available to attend community association meetings, organizational meetings, or meet one-on-one to learn about stakeholders' communities and organizations and their perspectives and concerns about the Red Line. Liaisons can also be found at many community events and festivals throughout the Corridor and Greater Baltimore Region.

To provide detailed input on specific stations, MTA mobilized more than 250 citizens and stakeholders to be part of Station Area Advisory Committees (SAAC), which met between October 2010 – June 2012. The SAACs, composed of residents, employees, businesses and other community stakeholders advised the MTA on station planning elements, such as station location and station design. The meeting notes, recommendation and vision and station design plans that the SAACs developed can be viewed via the SAAC link above. A streamlined version of the SAACs will continue to be engaged in the project.

Community members can also stay informed on the project by attending the Red Line Citizens' Advisory Council (CAC) meetings. CAC members are appointed by state and local elected officials. They meet on the second Thursday every other month at locations along the corridor. Meeting dates can be found on the CAC webpage by clicking the above link.



The Purple Line - is a proposed 16-mile light rail line extending from New Carrollton in Prince George's County to Bethesda in Montgomery County. It would provide a direct connection to the Metrorail Red, Green and Orange Lines. The Purple Line would also connect to MARC Train, Amtrak and local bus services

A Spanish translation link is available on the Purple Line website. This option meets the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency.

Methods for Engaging Minorities and Limited English Populations

The Maryland Transit Administration's Purple Line project public involvement activities include a wide variety of venues to engage community stakeholders of different races, color, and national origins. Also, these activities aim to make information available to Limited English Populations.

Activities include:

- Fact sheets and project information in English and Spanish.
- Newsletters and eNewsletters in English and Spanish.
 - Quarterly Newsletter often features a Hispanic-owned business in the corridor.
- Resource hubs for project information (for populations not connected to the Internet).
- Website in English and Spanish.
- Outreach phone line in English and Spanish.
- Poster placement at designated locations.
- Neighborhood Work Groups comprised of community members who would like to offer input at various stages of the project.
- Generally, Community Liaisons split the corridor by county but the Spanish-speaking liaison focuses on the communities with high Spanish-speaking populations.
- Information tables at various community events.
- Open houses.
- Targeted meetings for community-specific issues on project design.
- Business Outreach to businesses owned by members of the Hispanic community and community meetings with business associations like Langley Park Small Business Association, Takoma Langley Crossroads Development Authority and Long Branch Business League, which largely serve the Hispanic community.
- Provide translated information and project updates during the MTA Relocation Assistance Program interviews.
- Participation at Prince George's County Transforming Neighborhood Initiative (TNI) meetings.

The public involvement program implements a number of methods for alerting community members about opportunities to learn about and give feedback on project elements.

- Open houses are announced in advance on radio, local TV, in local and community newspapers, at transit stops, in mailings to addresses on the project mailing list, in notices stocked at resource hubs, on the project website, via social media and canvassing by Community Liaisons. Signage in the corridor also notifies community members about open houses.
- Neighborhood Work Groups (NWGs) were developed to facilitate two-way communication with small groups of community members. They are topical but also useful to address various questions/concerns.
 - NWGs generally cover two adjacent station areas.
 - Invitations are sent to all who signed up or have attended in the past, to local elected officials and county reps and to existing community associations. Meeting notification is also posted on website and via social media.
- The website and social media also provides venues for announcing meetings and posting pertinent information such as meeting presentation materials.
- Community Liaisons attend community association meetings to provide project updates and respond to communities' questions about the project. Community Liaisons also facilitate dialogue between MTA and communities.
- MTA is a partner and member of the Purple Line Corridor Coalition (PLCC). The PLCC engages historically under-represented communities in the corridor and helps them capitalize on the social, economic and environmental benefits of the project. Other nonprofit members include CASA de Maryland and Action Langley Park.

APPENDIX I – Fare Equity

The Maryland Transit Administration (MTA) has not conducted a fare equity analysis for any of its services as a change in fares has not occurred since 2003.

Note:

New Pricing Effective June 25, 2015

As required by the Transportation Infrastructure Investment Act of 2013 (known as the gas tax bill) the Maryland Transit Administration (MTA) will increase transit fares effective June 25, 2015. The increase meets the July 1, 2015 legislative deadline for implementing the new fares adjusted for inflation.

The 2013 law requires MTA to adjust fares for core services, which includes Local Bus, Light Rail, Metro Subway and Mobility/Paratransit services every two years, and for Commuter Bus and MARC Train every five years.

As outlined in the law, the increase in core service fares (single-trip full fare) is based on the increase in the Consumer Price Index (CPI) during the past two years, rounded to the nearest dime. This is the fare on which calculations for the rise in multi-use fares (Day, Weekly and Monthly Passes) is based. The current \$1.60 base fare (full-fare single-trip fare) for Local Bus, Light Rail and Metro Subway service will increase by ten cents to \$1.70. Other bus fares will increase, including school tickets by 10 cents and Mobility/Paratransit fares by five cents. The weekly core service (Local Bus, Light Rail and Metro Subway) fare will increase from \$16.50 to \$22 and the monthly core service fare will increase from \$64 to \$68 per month.

Fares for Commuter Bus and MARC Train will increase by the rise in the CPI for the last five years, rounded to the nearest dollar. MARC Train fares will increase by \$1.00 while Commuter Bus fares will increase from 25 cents to \$1.25 based on the distance traveled. The new multi-use fares (Day, Weekly and Monthly Passes) will also increase using the new base fare for the calculation.

APPENDIX J - MTA Regional Transit Map



PREPARED BY THE OFFICE OF FAIR PRACTICES

